

Chapter 1

Introduction to National Roadless Protection Rulemaking

This chapter includes two main sections: National Roadless Protection – General Remarks, and Issue Identification.

National Roadless Protection – General Remarks

This section includes two subsections: Need For a National Roadless Rule General and Need for the Roadless Area Conservation Rule.

Need for a National Roadless Rule General

Summary

A number of respondents question the need for a national roadless rule. They wonder why the Forest Service does not simply continue guidance under existing law, where they believe that the National Forest Management Act (NFMA) provides both guidance and opportunities for public input on a forest by forest basis, hence the Agency should not need a national policy. Some also point out that environmental laws are already in place, obliging the Forest Service to manage their jurisdictions in accordance with these laws. Others suggest the Forest Service delay development of a new rule until judicial resolution of the current Roadless Area Conservation Rule or until the forest plan revision process takes place.

Other respondents assert that a national roadless rule is needed. One of the most common reasons given for needing one is they believe the current forest planning process has failed to protect the environment in the past (see Chapter 3: Informed Decisionmaking (Question 1): Local vs. National Decisionmaking: *National Decisionmaking*

1. Public Concern: The Forest Service should clarify the need for a national roadless rule.

We are still mystified why the Department needs a new rule at all. The National Forest Management Act (NFMA), an existing law, clearly provides for public input to forest plans on a forest-by-forest basis. NFMA provides for a public involvement process (local, regional, and national) whereby anyone interested in the management of a particular [forest] can comment on, and be directly involved in, the management of those lands. (Elected Official, Fremont County, ID - #A4942.20201)

You should also seriously consider whether this entire process is really warranted. The Forest Service is perfectly able to manage the lands it controls under its existing management prescriptions. Another Washington based management directive is duplicative of existing powers, a waste of time and money and will never take the place of local management. (Organization, Steamboat Springs, CO - #A18447.10112)

BECAUSE EXISTING LAW ALREADY MANDATES ENVIRONMENTAL PROTECTION

An area of concern to many is the area of environmental protection afforded the Forest Service lands. Environmental protection is currently mandated and governed by many federal laws with jurisdiction on Forest Service lands—the Clean Water Act, Clean Air Act, and numerous other laws governing environmental activity on public and private property. Additional protection in the form of “roadless” areas is not warranted nor justified. (Business or Association, Novato, CA - #A17652.10112)

BECAUSE EXISTING LAW ALREADY PROVIDES FOR ADEQUATE PUBLIC INVOLVEMENT IN FOREST MANAGEMENT DECISIONS

As forest users and outdoor enthusiasts we are used to providing input on forest service plans and projects. We did so on the original roadless area proposal. Imagine our surprise when the Clinton administration released its top-down, government-knows-best roadless proposal. None of our comments were considered in that proposal. That Roadless Rule flew in the face of NEPA and NFMA direction for obtaining public input. In fact, we are still puzzled why the Department needs a new rule at all. The National Forest Management Act (NFMA), an existing law, clearly provides for public input to forest plans on a forest-by-forest basis. NFMA provides for a public involvement process (local, regional and national) whereby anyone interested in the management of a particular forest can comment on, and be directly involved in, the management of those lands. (Organization, Saint Anthony, ID - #A13225.20200)

*Develop a National Roadless Rule***2. Public Concern: The Forest Service should develop a national roadless rule.**

Why do we need roadless areas? You’ll get as many different reasons as there are people: spiritual, wildlife and wildlife habitat, fisheries, water quality, tranquility, soils, intact ecological processes, freedom, wildness. The list could go on. Separately, these are good reasons; however, taken together, the reason becomes overwhelming. The American public, whether they live next to a roadless area or in a large eastern city, wants roadless protection. Protecting roadless lands means no roads, no logging, no ORVs, no mining, period. Our roadless lands don’t need protection from fire or insect and disease, they need protection from human intervention, which has done more in the last fifty years to throw our forestlands out of whack than Nature could ever do. (Organization, Missoula, MT - #A21359.10111)

BECAUSE ONCE THESE AREAS ARE GONE THEY’RE GONE FOREVER

I hike in wilderness areas all over New Mexico as often as I can. I raft several times a year through wilderness areas in Colorado. The beauty and peace of these areas is unsurpassed. The bounty of the wildlife living in these areas is also a thing of wonder. Once these areas are gone they can never be reclaimed. Wilderness areas are what make our country so unique, and are part of our heritage. (Individual, No Address - #A4648.10111)

If these lands are protected now, future decisions under different conditions could change land designations as needed. If roads are allowed now, there is no turning back. The USFS and US taxpayer cannot continue in the business of subsidizing local resource based economies that refuse to move into the 21st century. The whole world is changing a lot. If small towns aren’t willing to change also, too bad. Keep in mind that this country will likely be around for a long time while our population continues to grow. If we do not stop this road building now, there will not be nearly enough roadless land around to meet our needs when our population reaches 400 or 500 million, as we are well on the way to doing. Once these lands are roaded, you can NEVER go back! (Individual, Boise, ID - #A8715.10111)

My family, and I regularly seek out these roadless areas. So much of the backcountry is currently taken over by off-road vehicles, extraction industries, and development. We need these last roadless areas to be protected before they are gone forever. (Individual, Helena, MT - #A5298.10111)

BECAUSE INDIVIDUAL STATES ARE UNABLE TO ADEQUATELY PROTECT ROADLESS AREAS

Most of this land is in the rural West and our western politicians, like our current president, are a little too accommodating to the oil, timber, and mining industries. This is the reason we need federal protection of these areas. Our western leaders in their quest for “states rights” seem to have forgotten that the balance of power between Federal state governments was “hardwired” into the constitution by America’s founders, who brilliantly recognized that the sharing of authority among state and federal governments would allow each to make its separate contribution to the building and sustaining of the country and its citizens. It is called federalism and it works.

Besides, many of the Federal programs currently in existence were created to achieve what the states have been unable or unwilling to do on behalf of their citizens. (Individual, Ketchum, ID - #A7766.12200)

BECAUSE MOST NATIONAL FOREST SYSTEM LANDS ARE ALREADY MANAGED FOR MULTIPLE USES

In Idaho, we have over 8 million acres of unprotected roadless lands in need of protection. By far, the majority of National Forest lands are already open to multiple use management, and the remaining National Forest roadless lands, which make up less than 3% of lands in the United States, deserve the greatest protection that can be afforded in order to ensure their preservation as intact, virgin ecosystems that will provide clean water, air, wildlife habitat, and undisturbed recreation opportunities for future generations. (Individual, Idaho Falls, ID - #A1330.10111)

BECAUSE ROADLESS AREAS ARE NEEDED TO PRESERVE ENVIRONMENTAL AND HUMAN VALUES

Roadless areas are the more remote sensitive areas of the United States. Activities from extraction industries often have greater impacts in these areas. Clearcutting and roadbuilding in these areas may produce flooding, erosion, landslides, and stream silting. I urge you to leave these areas wild in order to safeguard water recharge areas, species diversity, and air pollution filtering. (Individual, Westminster, MD - #A1604.10111)

We need the freedom, and resources, to get lost in the beauty of nature. We are quickly running out of such places. Forest areas need to be preserved. Logging should be banned in the roadless areas. These tracts of forest need to be protected, as they provide protection for wildlife. They also provide clean water and help to clean the air. (Individual, Rochester, NY - #A3718.10111)

I support roadless protection because roadless areas protect water quality for fishing, swimming, drinking, and life. As stated earlier, roadless areas function as biological strongholds for rare wildlife, provide large, relatively undisturbed landscapes important for protecting the greater ecosystem, present opportunities for healthy exercise, recreation, and solitude, and offer opportunities for scientific study and research. (Individual, Seattle, WA - #A4885.10111)

As a seasonal wilderness ranger, avid outdoorswoman, and an American citizen I use National Forest land to cross country ski, hike, mountain bike, camp, fish and most importantly to learn. I have learned that a healthy forest has a diverse biological make-up that I have fortunately witnessed as a brown bear dined on salmon. I have learned that National Forest land is the primary provider for Americans’ clean water. I have also learned the value of peace and solitude on extended hikes or travels that have revived my spirit. For these reasons and several more is why our remaining roadless National Forest Land should remain roadless. (Individual, Juneau, AK - #A13354.10110)

BECAUSE THE MAJORITY OF CITIZENS ENJOY USING ROADLESS AREAS

From a purely economic standpoint, roadless land provides far more short and long term returns than does extractive practices. This is evidenced by a couple of simple observations:

National Parks and Wilderness areas are under ever-increasing pressure due to crowding/over-use. Indeed many areas have had to go to a reservation system (see Alpine Lakes Wilderness Area in my area) to limit the number of people. Clearly the majority of citizens of this country enjoy using roadless land and are even willing to pay for it (the trail-head user fee now imposed by the USFS). (Individual, Seattle, WA - #A4885.10111)

TO SETTLE CONTROVERSIES REGARDING ROADLESS AREAS

On many national forests and grasslands, roadless area management has been a major point of conflict in land management planning. The controversy continues today, particularly on most proposals to harvest timber, build roads, or otherwise develop inventoried roadless areas. The large number of appeals and lawsuits, and the extensive amount of congressional debate over the last 20 years, illustrates the need for national direction and resolution and the importance many Americans attach to the remaining inventoried roadless areas on National Forest System lands (FEIS Vol. 1, 1-16). These disputes are costly in terms of both fiscal resources and agency relationships with communities of place and communities of interest. Based on these factors, the agency decided that the best means to reduce this conflict is through a national level rule.” (Organization, Plymouth, MN - #A7116.16000)

Do Not Develop a National Roadless Rule

3. Public Concern: The Forest Service should not develop a national roadless rule.

BECAUSE CURRENT LAW ADEQUATELY PROTECTS THE ENVIRONMENT

An area of concern to many is that of environmental protection regarding Forest Service lands. Environmental protection is currently mandated and governed by many federal laws with jurisdiction on Forest Service lands, including but not limited to the Clean Water Act, Clear Air Act, and numerous other laws governing environment-related activity on public and private property. Additional protection in the form of “roadless areas” is unjustified: it is duplicative and unnecessary. (Individual, Reno, NV - #A20857.20000)

BECAUSE THE NATIONAL FOREST MANAGEMENT ACT ALREADY ADEQUATELY PROVIDES FOR PUBLIC INPUT

The Clinton roadless rule was an abomination and an affront to our constituents and us. We are relieved to hear Secretary Venemon is going to reexamine the rule.

We are still mystified why the Department needs a new rule at all. The National Forest Management Act (NFMA), an existing law, clearly provides for public input to forest plans on a forest-by-forest basis. NFMA provides for a public involvement process (local, regional and national) whereby anyone interested in the management of a particular forest can comment on, and be directly involved in, the management of those lands.

Former President Clinton chose to override that public involvement process with a top-down, Washington-knows-best approach. In effect, he chose to impose his own values on the rest of us. As a result there are now 8 lawsuits, involving 7 states, in 6 federal districts, and 4 federal circuits. The federal judge hearing the case in Idaho stopped implementation of the rule, saying it was “fatally flawed”. It appears to us, therefore, that the Clinton rule need only be set aside and we can return to the public involvement process for forest planning. That is the long and short of our input. We will respond to your 10 questions, but they will be largely redundant because our answers tie directly back to this point: **GET RID OF THE CLINTON RULE; REINSTATE NFMA.** (Elected Official, Clark County, ID - #A23504.20201)

BECAUSE THE COURTS HAVE ESTABLISHED THAT NATIONAL FORESTS ARE NOT WHOLELY DEDICATED TO RECREATIONAL AND ENVIRONMENTAL VALUES

This national rulemaking attempt, in addition to completely sidestepping NFMA planning requirements, considers only land preservation alternatives (with the exception of the no-action alternative) and ignores the multiple-use mandate that the Forest Service must follow. The courts have separated the sustained-yield and multiple-use mandate of national forests from other Congressional mandates, such as national park management, and have clearly distinguished national forests as being not wholly dedicated to recreational and environmental values. (Tribal Corporation, Anchorage, AK - #A20340.20202)

BECAUSE FORESTS ARE IN BETTER SHAPE NOW THAN AT ANY OTHER TIME IN RECENT HISTORY

I believe this whole exercise is unnecessary. The forests are in better shape now than they have ever been within recent history, further restrictions are unnecessary. (Individual, Tustin, CA - #A20777.10112)

BECAUSE THE AGENCY ALREADY HAS ENOUGH REGULATORY CONTROL AND MANAGEMENT AUTHORITY TO PROTECT THESE AREAS

The proposed regulations were only an attempt to limit legitimate development and use by certain commodity producers such as those in mining, and timber and food production as well as to limit access and use by off-highway vehicle users. The Forest Service already has more than enough regulatory control and management authority to control and protect areas within National Forests. Travel management plans can achieve many of the same results. The only thing travel management cannot do is prohibit legitimate and legal development and use of natural resources such as timber and mining. Under the proposed regulations almost any area could be designated roadless regardless of its current use and available access. The approach taken in the Roadless Rule again undermined the Forest Service's credibility to effectively work with local communities and has further eroded the trust and confidence Lander County has in the agency to manage natural resources. (Elected Official, Lander County, NV - #A27730.12230)

4. Public Concern: The Forest Service should delay development of another national roadless rule**UNTIL JUDICIAL RESOLUTION OF THE ROADLESS AREA CONSERVATION RULE**

A finding that the 2001 roadless area rules are invalid could change the type of roadless area proposal that this Administration chooses to advocate and adopt. If the Administration's roadless area initiative is compared against the baseline of the roadless area uses allowed under the controlling forest plans (rather than the baseline level of protection under the invalid January 2001 roadless area rules), the Forest Service may have more room to adopt measures that include greater preservation of roadless areas than the forest plans provide for, but which allows for more forest health protection and developmental uses than under the January 2001 roadless area rules.

The Forest Service and this Administration would be exposed to greater public criticism: (1) if it starts with one roadless regulatory proposal, then shifts course after the roadless area rules have been invalidated in court; and (2) requests public comment several times on different rulemaking proposals, and NEPA, and RFA compliance documents.

Thus, the public interests in efficient government, in not wasting the public's time in commenting on likely-unlawful proposals, and in legal certainty all favor obtaining judicial resolution of the roadless cases before the Forest Service proceeds too far on another roadless rulemaking proposal. (Association, Kalispell, MT - #A20940.20000)

UNTIL FOREST PLAN REVISION PROCESSES TAKE PLACE

The Roadless Initiative is not following the regulations of the National Forest Management Act (NFMA) or the Wilderness Act. Many of the national forests are in the process of revising their forest plans. This latest initiative has thwarted the national forest planning process. The Forest Service should wait until the Gila National Forest planning process to consider such a substantial withdrawal of multiple use lands. (Manager, Sierra County, NM - #A22059.20201)

Need for the Roadless Area Conservation Rule**Summary**

General Comments – Some respondents state that the Forest Service should clarify the need for the Roadless Area Conservation Rule since, they say, it does not address the stated purpose and need and prove there should be a nationwide ban on road construction.

Implementation of the Roadless Area Conservation Rule – People comment on whether or not the Roadless Area Conservation Rule should be implemented as is, revised, or eliminated all together. The reasons given are numerous and varied. Some respondents state that the 2001 Rule meets the five principles of roadless conservation. Furthermore, they believe the current Rule adequately addresses the issues of fire management, forest health, access, and local input, so do not think there is a need to revise the current Rule. Others believe the Rule did not adequately address these principles at a local level, so consequently the Rule needed to be re-opened for public input. These principles included; informed decisionmaking, collaboration, forest protection, private property protection and ensuring legal access (see Chapter 3: Informed Decisionmaking (Question 1): Local vs. National Decisionmaking: *National Decisionmaking*).

Respondents also question the need to repeat the process due to allegations that there was not enough opportunity to comment last time around. According to these respondents, the time spent on public involvement for the draft Rule was more intensive than the current ANPR 60-day comment period. These respondents also felt that being asked to comment on 10 questions indicated that those answers would be given more weight than simple comments about roadless policy in general. They also question the objectivity of the 10 questions and assert that the majority should prevail, regardless of specificity. Respondents also disagree with what they believe the Forest Service is saying about not having any local and State support for the Rule.

Respondents also assert that revisiting this process will have several negative effects. First, they say, it will be a waste of taxpayer money. Others say that revisiting the Rule will weaken public trust in the federal government in general, and in the forest planning process in particular. They question why their concerns were not heard during the first two go rounds of comment.

Other respondents request that the Rule not be implemented. Just as those who ask that the Rule be implemented question the motives behind the current process, those who ask that it not be implemented question the integrity of the previous roadless process. Several say the Rule was developed using emotion, not logic, or based on subjective reasoning. Respondents question the validity of the Rule since, they assert, it lacks site-specific information. Some point out that they believe there is a lot of information available to the Agency that the previous process did not avail itself of.

Some respondents believe the government is intruding into their geographical part of the country and their way of life, while other individuals state that the existing Roadless Rule does not adequately consider effects of fire fighting, public safety, access to private property and still others write that policies and regulations, in place prior to the Roadless Rule, were adequate for forest health and conservation.

Finally, one respondent advocates that inadequate road maintenance funding should not be used as a reason for implementing the Rule. This respondent suggests that other alternatives, such as requests for additional funding for roads from Congress, or allowing road maintenance by the private sector, should be considered and published for public comment.”

Revision of the Roadless Area Conservation Rule – Individuals who suggest revising the Roadless Area Conservation Rule request fewer restrictions, while those who request more restrictions generally ask for the Rule to be strengthened. The reasons given for revising the Rule generally echo the reasons for not implementing the Rule mentioned in previous paragraphs. There are respondents who believe the Rule should be revised because the process leading to its development was inadequate. Other respondents who request the Rule be strengthened generally

ask that the exemptions be removed from the existing Rule, such as public health and safety and go on to request that the Rule should have more restrictions, such as prohibitions on motorized recreation and hard rock mining.”

Defense of the Roadless Area Conservation Rule – Respondents request that the Forest Service, the Department of Agriculture, and the executive branch defend the Roadless Area Conservation Rule. They assert that the new Administration the Rule’s legality and request and request that all three levels of government mount a defense against the lawsuits challenging the Rule.

Several individuals specifically request that the Rule not be defended in court. One respondent, r, asserts that the Administration should not spend taxpayer money defending against laws suits that they see as legitimate and view any defense as restricting and giving in to only one segment of the population.

Other General Comments – Some individuals state that the Roadless Area Conservation Rule is difficult to interpret and needs clarity. Others say the Forest Service should abide by decisions already made, and emphasize work on other priorities such as compliance with NEPA, the threat of unnatural wildfire, and the spread of noxious weeds. Some respondents comment that a rule should not be developed which will affect eastern and western states differently, while another individual suggests separating the Rule into two distinct policies, for administrative purposes, local prescriptions and cumulative effects.

Need for the Roadless Area Conservation Rule General

5. Public Concern: The Forest Service should clarify the need for the Roadless Area Conservation Rule.

BECAUSE THE RULE DOES NOT ADDRESS THE STATED PURPOSE AND NEED

We note that in the DEIS (3-6) there is a reference that the regions with the highest population densities have the least amount of inventoried roadless areas and that the highest demand for the unroaded benefits are in these areas. However, we also note that the areas with the most inventoried roadless areas (Alaska and Idaho) are in fact farthest from the population centers (DEIS 3-3). Given [where] the demands for roadless lands are located, it appears that the proposed action with its emphasis on unroaded areas in low population density areas does not address the stated purpose and need. (Elected Official, Douglas County, OR - #A11811.10000)

First, we feel the ANPR fails the test of Executive Order 12866 requiring agencies to identify a need for new regulations. The Forest Service has stated that the three reasons for the proposed rule are: (1) road construction can alter the fundamental characteristic of roadless areas; (2) budget constraints limit the number of roads that can be adequately maintained; and (3) the controversy over management of roadless areas causes costs and delays. However, the Forest Service did not identify a market failure or other compelling public need for the proposed rule. None of the three stated reasons indicate a need for a nationwide ban on road construction within Forest Service managed lands. In fact, a review of our company’s cooperation and partnership with the Forest Service demonstrates that all three of the above concerns can be successfully addressed and mitigated through a local control and planning process. (Business or Association, Pocatello, ID - #A20842.10000)

BECAUSE ONLY A SMALL PERCENTAGE OF ROADLESS AREAS IS PROJECTED TO BE DEVELOPED BETWEEN 2000 AND 2004

I agree with Secretary Veneman’s 5 principles.

Other Resource potentials really are not realistic for the Tongass if roads can't be built - logging, at least, would be nearly impossible. Current Forest plans assign about 41 percent of total I.R.A. to roadless management. This is enough. Only about 16 percent of the total I.R.A. is productive timberland that might have roads built for timber harvest, according to your figures. And if the Forest Service Roadless Area Conservation Final Environmental Impact Statement (USDA Forest Service, November 2000, pages 2-25) estimated that less than two-tenths of one percent of the total of inventoried roadless areas (94,600 acres of 58.5 million acres) might be developed between 2000 and 2004, then what is the need for the Roadless Rule? (Individual, No Address - #A1133.10110)

6. Public Concern: The Forest Service should explain how current management does not provide the protection which it is the purpose and need of the Roadless Area Conservation Rule to provide.

The roadless proposal implies that the current management does not "protect" these areas however none of the materials to date have examined the site specific management currently in place for these areas. We suggest that any analysis include a review of the management currently in place and describe how these strategies do not provide the perceived protection that is the purpose or need for the proposed action. (County Attorney, Grant County, OR - #A17667.30100)

Implement the Roadless Area Conservation Rule

7. Public Concern: The Forest Service should implement the Roadless Area Conservation Rule as it now stands.

I am writing to support the Forest Service's Roadless Area Conservation Rule as it now stands. This policy was developed after extensive public hearings and legislative consideration over time.

We need to keep a BALANCED approach to forest conservation to save our remaining 30% of America's wild national forests from logging, mining, and drilling—activities already allowed on most national forest lands. The current rule adequately addresses the issues of fire management, forest health, access, and local input. (Individual, Fort Lauderdale, FL - #A20.10110)

I can attest that America is what it is today because of its beautiful woodlands that house creatures great and small and a variety of plants/trees. We must do everything we can to protect the woods. Clinton's wild forest protection act was not a hasty decision. Instead, it was born out of many years of research and discussions with average citizens and scientists in the field. It is what Americans want. So please let Clinton's roadless area plan stand as is with no modifications that would only destroy it. (Individual, Columbia, MO - #A24.10110)

On May 4, USDA Secretary Veneman announced that the Forest Service "will implement the Roadless Area Conservation Rule" and that the administration "is committed to providing roadless protection for our national forests." If the administration is sincere in its support of the protection provided by the Roadless Rule, it will respect the clearly expressed wishes of the public and decide not to tamper with the rule. (Organization, Washington, DC - #A20424.10150)

I am writing to you to urge you to preserve the Forest Service's Roadless Area Conservation Rule as it now stands (including in it the recently protected Tongass National Forest). This policy is the product of the most extensive federal rulemaking in history, with more than 600 public hearings and 1.6 million public comments, 95% of which support the strongest protection. (Individual, Brooklyn, NY - #A172.10111)

I still strongly support the protection of wilderness areas covered under the Roadless Area Conservation Rule since they provide, among other things, clean drinking water; protect water quality for drinking, fishing, and swimming; function as biological strongholds for rare wildlife; provide large, relatively

undisturbed landscapes important for protecting the web of life; serve as barriers against the spread of weeds and pests into pristine areas; offer opportunities for scientific study and research; provide open space and unspoiled vistas; and preserve areas needed for traditional Native American religious and cultural observances. (Individual, Roanoke, TX - #A4626.10150)

Not to flagellate a dead equine, but this process, in and of itself, is the most pressing concern to me. Like a recalcitrant child, the Forest Service continues to ask the same questions, hoping to get a different response. Well, it's not going to happen. The overwhelming majority of Americans want to protect roadless areas. The overwhelming majority of people who commented on the roadless rule (be they from NYC or Montana) supported the Rule as it is written. I will be one of literally tens of thousands of people who write this simple message to you. The Forest Service should support and implement the Roadless Rule just as it is. (Individual, Lewiston, ID - #A29569.10150)

BECAUSE ONLY A NATIONAL RULE CAN GUARANTEE PROTECTION OF NATIONAL FORESTS THROUGH CHANGING POLITICS AND PERSONNEL

We SUPPORT THE ROADLESS CONSERVATION POLICY—JUST AS IT IS . . . Only national protection will guarantee that Idaho's wild national forest lands remain intact regardless of changing politics and personnel. (Individual, Clayton, ID - #A5310.10150)

I support the roadless Area Conservation Rule as it is. National protection is best for these lands. During 18 seasons of work in Wilderness (Absaroka-Beartooth) and on Lookouts, I've seen how a change in personnel and politics can change land-use. If we're serious about keeping roadless areas intact (and I think we should be) national protection is the best way to do it. (Individual, Billings, MT - #A8697.10150)

Because the National Forests are a national resource, only national protection of the roadless areas will guarantee that wild national forest lands, in those states where they exist, (such as Wyoming, where I grew up, or Montana, where I have hiked and hunted in wilderness areas) will remain intact regardless of changing local and national politics and personnel. (Individual, Somerville, MA - #A9107.10111)

I am writing to you today to express my strong support of the roadless Area Conservation Policy, and to urge the U.S. Forest Service to implement the policy as it is currently written. Only national, coherent protection will guarantee that our wild, roadless national forest lands remain intact for generations to come—regardless of shifting politics and changing agency staff. Our partly owned roadless lands are part of an invaluable, irreplaceable national treasure; it is incumbent upon us to ensure this treasure can be cherished by our children and their children. (Individual, Portland, OR - #A19217.10111)

BECAUSE IT PROVIDES CONSISTENT STANDARDS

A national policy is needed to establish a set of standards to protect all National Forest roadless areas. Please implement the Roadless Conservation Rule that was set to go into effect in March. (Individual, No Address - #A3061.10150)

Question 1: Generically speaking, forest planning as mandated by NFMA is the appropriate arena for making determinations concerning Roadless Area management. However, there must be regulations that aid Forest Supervisors and the plan revision team that provide a consistent procedural approach to Roadless Area management. (Individual, Quarryville, PA - #A15217.13130)

SDSAF urges the Bush administration to develop a new rule that:

- establishes national standards to guide roadless area conservation
 - requires Forest Service line officers to apply those standards through the forest planning process.
- (Professional Society, Rapid City, SD - #A21751.13130)

BECAUSE THE FIVE PRINCIPLES OF ROADLESS CONSERVATION HAVE ALREADY BEEN FOLLOWED

Simply I believe that the five principles of roadless conservation that you ask the public to follow in this case, informed decisionmaking, collaboration, forest protection, private property protection and ensuring legal access, have already been closely followed. (Individual, Clayton, GA - #A15320.10111)

BECAUSE IT IS BASED ON THE BEST AVAILABLE SCIENCE

Other concerns. My main other concern, which I related in part in previous comments, is that your decision be based on the majority of public comments and on the best available science, not by politics, especially what I fear will be the influence of special interests on the environmental policies of the current administration. In the previous planning process, 95% of respondents were in favor of protecting the remaining roadless areas. While I appreciate the importance of forest products, I also appreciate the importance of the values that are unique to our remaining roadless habitats and that should be protected. Scientifically, it has been well established that roads are major causes of noxious weed invasions, degradation of fisheries and spawning beds, disruption of hydrologic cycles, spread of exotic diseases and pests that threaten forests (e.g. Chestnut blight, sudden oak death syndrome), erosion, and fire. Many important animal species avoid roads (wolves, grizzly bears, black bears, wolverines, fishers, martens, lynx, bobcats), while many native plant species are displaced by weeds that are only able to enter systems because roads acted as corridors for their invasion. The scientific basis of maintaining roadless habitats is well established and supported by overwhelming evidence that has been compiled by some of the world's best scientists. I know this very well because my Master's research explored the ecological effects of roads (including a current paper just submitted to Conservation Biology, authored by myself and a USGS scientist), and my current Ph.D. research concerns ecological effects of roads on exotic plant invasions, including a paper that I am about to submit to Ecological Applications. (Individual, Davis, CA - #A30523.10150)

BECAUSE ONCE THESE PLACES ARE GONE THEY'RE GONE FOREVER

The term roadless values is relative. To loggers and developers, it means money. To those of us who enjoy the outdoors for recreation, sometimes it can mean sanity. Let the rule stand as written. Again I say this—and cannot say it strongly enough—WHEN THESE FORESTS ARE GONE THEY ARE GONE FOREVER! Surely 95% of the people who took the time to give input can't ALL be wrong. Let's give the American public its due and listen. I hope these comments will not be met with the silence I love hearing in the forests. They are there for us—let's be there for them. (Individual, Rex, GA - #A576.10150)

Roadless areas may be the most important use of the National Forest, which is dedicated as a land of many uses. Roadless areas encourage biodiversity, offer unique recreational opportunities and protect wilderness for future generations. A shockingly small percentage of land in the United States is in designated roadless area. We must protect these remaining areas because once they are violated they cannot be replaced. Wilderness is not a renewable resource. (Individual, Afton, WY - #A10526.10150)

BECAUSE IT IS LONG OVERDUE

For many years, I have participated in the forest service planning process before government committees, the Bolle Commission, on primitive areas, on Wilderness areas, RARE I, RARE II, and the Tongass Land Use Management Plan 1975 through 2000. I can say after 47 years of documented involvement in the forest service planning process, that the Roadless Rule was long overdue. When Congress passed the Organic Act in 1897, and President Theodore Roosevelt added 140 million acres to the national forest system in 1907, it was to protect the remaining public forests from the timber barons and the railroads. There has been over 100 years of public testimony on the Roadless Rule, attempting to protect the watersheds of our nation.

The Forest Service, which after WWII should have changed its name to the Road Service for the timber Industry. That is clearly evident in the Tongass National Forest in Alaska on Prince of Wales Island. This 1.5 million acre island owned by the public and administered by the USFS in Alaska has almost as many miles of road as the entire State of Alaska (365 million acres+) and 190 miles of road on Prince of Wales Island (1.5 million acres).

If it had not been for President Theodore Roosevelt in 1909 adding more than 140 million acres to the national forest system, we would have nothing left for the Roadless Rule. This has not been a rushed process. The Roadless Rule is documented in public administration for having the largest public hearing in USFS history and coming up with a ruling in 18 months. If only the congress could do so well. (Individual, Juneau, AK - #A2317.10111)

TO AVOID REPEATING MISTAKES OF THE PAST

It is of paramount importance that we understand when our roadless areas and wilderness are gone, they WILL BE GONE.

If you doubt my words, look at countries [which] have done just that. Surely we can learn from their mistakes, before it is too late for us and our lands.

I ask that you honor my and the 1.5 million of American people's request to leave all the million acres of roadless areas BE. (Individual, Grass Range, MT - #A18058.10111)

I have heard of the Cedars of Lebanon, but today they exist only on the Lebanese flag. The Landes area of France is nothing but sand dunes now because of over cutting of a huge forest area in order to construct sailing ships. Please, let us not make similar mistakes. (Individual, APO, CA - #A12817.10111)

The Maine woods is just beginning to recover after being logged and burned in the mid 19th century, the pine forests of the Great Lakes states have still not recovered from similar treatment 100 years ago. The western fir and pine forests are riddled with logging roads and clear-cuts, except for a few islands of late successional forest and roadless areas. Last year, I, and a million people like me, supported the cessation of logging, roading, and mineral leasing in roadless areas of the national forests. We did so to preclude repeating the same mistakes that our culture did as it moved west. Now we are being asked to reconsider. (Individual, Corvallis, OR - #A7998.10111)

I have lived in Alaska since 1972. I have a Masters degree in resource economics. Economics is the study of scarce resources. Our forest resources belong to us all, subsistence hunters and urban dwellers alike, fishermen and tourists and residents. Except for one industry, the timber industry, which has already cut down 70% of the best Tongass habitat, the rest of us depend on intact habitat and plenty of it for fishing, hunting, berry and mushroom gathering, and just camping with the kids. Must we repeat all the mistakes of the lower 48? (Individual, Juneau, AK - #A23012.10111)

BECAUSE IT REPRESENTS A BALANCED APPROACH TO FOREST CONSERVATION

The January ruling, as published, provides for the remaining 31% of our forests to be protected as roadless lands. As the January roadless conservation rule sets forth, a grand compromise balances roadless conservation versus development. Setting aside only 31% of our forests is, in the face of all the forests that have been cut, drilled and mined to date, less than optimal. However, it is a worthy compromise and it needs your unwavering support. (Individual, Oswego, IL - #A12043.10111)

I recently receive a copy of the "Forest Service's Roadless Area Conservation Rule" to review. I have completed my review and I am writing this letter in support of the Rule.

The Rule represents a balanced approach to forest conservation and protecting important roadless areas from damage caused by activities already allowed on most National Forest Lands. The Rule in its present form adequately addresses the issues of fire management, forest health, access, and local input. Because I am an elected official, the opportunity for local input is always a plus for me. I am opposed to weakening National Forest protection in favor of logging and development in roadless areas on a forest-by-forest basis. This type of practice has led to a steady decline of these precious lands.

The comprehensive and inclusive public process outlined in the Rule should reassure decision makers of the public support for the Roadless Areas Rule. The forestlands provide numerous amenities, which are enjoyed by all Americans. The Rule will allow logging to continue on most Forest Lands while

protecting 31% of these lands for other values. This balance is very important to me and is the primary basis for my support of the Rule.

Therefore, I encourage the implementation of the "Roadless Area Conservation Rule as promulgated." (Individual, Little Rock, AR - #A19226.10111)

The last wild roadless areas of our National Forests are critical for priceless ecological services such as clean water sources, and habitat for diverse fish, wildlife and plant species. They also provide unique recreational opportunities for those who like to hike, hunt, camp and fish. Over half of our national forests are already open to logging, mining, roadbuilding, and other development. The 58.5 million acres protected by the Roadless Rule should remain protected from logging and other destructive activities not only for the benefit of all Americans today, but also for future generations. (Individual, Charlottesville, VA - #A5097.10111)

Presently, 51 percent of the national forests remain open for logging, mining, and other resource activities, while only 18 percent have been designated as wilderness areas. The rule, without modifications, will ensure that the last 31 percent remains unspoiled and protected from logging, mining and road-building. I support the Roadless Area Conservation Rule, without modification, because it achieves a true balance between the recreational and extractive uses for our national forest lands. I am concerned that changes to the rule will significantly weaken protections for these special places. I urge you to let the rule stand as it is written in the January Record of Decision. (Individual, Concord, NH - #A19701.10150)

Much to the dismay of the public, National Forest Service lands are already heavily roaded and frequently harvested for timber. **PRECISELY BECAUSE IT IS NECESSARY TO BALANCE THE ECONOMIC INTERESTS OF TIMBER COMPANIES WITH THE MORAL, AESTHETIC AND RECREATIONAL INTERESTS OF THE PUBLIC, THE FOREST SERVICE SHOULD MAINTAIN THE ROADLESS RULE AS IT PRESENTLY EXISTS.** (Individual, No Address - #A5948.10000)

BECAUSE IT STILL LEAVES AMPLE AREA FOR OTHER USES

Protecting less than one-third of the national forests from logging and road building for recreational use and resource conservation should leave more than enough areas remaining for special interest logging and other commercial uses. (Individual, Tucker, GA - #A4543.10111)

As a frequent recreational user in our National Forests, I would like you to know that I am very concerned about the current proposed changes to this rule that was previously commented on by 1.6 million Americans, myself included. I have been hiking and camping in nearly two dozen of our National Forests and found roadless areas to be in need of the protections that this rule will (in its current form) enable. Furthermore, there are ample areas of the USFS system open to commercial exploitation. Personally, I would prefer that my grandchildren be able to experience the wild Monogahela, Kaibab or Tongass as they have always been than to say someone made money by culling these forests in the past. (Individual, Rockville, MD - #A4974.10111)

BECAUSE IT ADEQUATELY PROTECTS OTHER INTERESTS

We do not need more timber roads in the forest just to log one quarter of one percent of the national timber supply. The rule as it stands exempts all acres currently under lease for logging. Furthermore, it preserves existing access for motorized recreation, mountain biking, hunting and fishing. It also permits construction of new roads for fire suppression and for stakeholders with existing statutory rights. It also allows for the cutting and removal of trees for fire prevention. (Individual, No Address - #A3605.10150)

I am writing to express the support of the California Department of Forestry and Fire Protection (CDF) for the Forest Service Roadless Area Rule (Rule) as adopted on January 12, 2001. The protection of wildlands and roadless areas provided by the Rule is important to many Californians. In its existing

form, the Rule poses no major impediments to CDF in its collaborative work with the US Forest Service to protect the citizens and natural resources of the state. CDF appreciates the degree to which the final Rule was responsive to the issues raised both by CDF in its scoping letter of December 21, 1999, and by The Resources Agency of California in its letter of July 28, 2000, resending to the Draft Environmental Impact Statement. (State Agency, Sacramento, CA - #A18110.10150)

BECAUSE SO MUCH FOREST LAND HAS ALREADY BEEN ACTIVELY MANAGED

Please enact the roadless rule! Too much of our forest land is logged, developed, and industrialized. The forests are shrinking every day, and this is one of the most important steps to take to ensure the future of woodlands. One day, even if not in our lifetime, someone will ask Why did they destroy the most important habitat on Earth? What was the reason? Was it money? Was it pressure from logging and mining companies? Was it pressure from PROGRESS??? (Individual, No Address - #A4590.10110)

Enough of America's forests and wild lands have already been ruined as a result of poor planning and misuse by unconcerned industry interests. There are no good reasons for altering the Conservation Rule, as it contains provisions for fire management, forest health, access, and local input. (Individual, Davis, CA - #A170.10111)

I care about conservation and am deeply concerned about the possibility of losing valuable wild land to roads and the uses that would engender. There are so few truly wilderness areas left. What about the people who want a true wilderness experience? Soon the world, and worse, the United States will have no areas left to provide that if we further encroach on what we have left. Please don't rescind the 'roadless' rule, but let it stand. (Individual, Hopkins, MN - #A217.10111)

Under current forest plans, about 60 percent of the remaining roadless areas are available for road construction and logging. The Roadless Area Conservation Rule is needed to prevent further incremental loss of roadless areas. The appropriate role for forest planning is to provide additional protection of roadless areas, such as preventing off-road vehicle damage, and identifying roadless areas omitted from Forest Service inventories. (Individual, No Address - #A4758.10110)

BECAUSE WILDERNESS AREAS ARE TOO HIGH IN ELEVATION AND TOO FAR SEPARATED FROM EACH OTHER TO ADEQUATELY PRESERVE BIODIVERSITY AND WILDERNESS RECREATION

Years before the process that led to the Roadless Area Rule began I had, through research and personal experience, come to the conclusion that protecting roadless areas was absolutely essential for the long-term health of the forest and its indigenous wildlife. While one third of the White River—750,000 acres—is designated Wilderness, these areas fail to protect biodiversity or provide adequate opportunities for wilderness recreation for two fundamental reasons: they are too high in elevation and too far separated from each other and from centers of human population. The Roadless Rule, as it stands, would correct these critical deficiencies in the management of the White River National Forest and provide more benefits than costs to our local communities and economy. (Organization, Carbondale, CO - #A17314.10111)

BECAUSE ROADLESS AREAS SERVE A DIFFERENT PURPOSE THAN WILDERNESS AREAS

The National Forests belong to all Americans and this decision should not be placed in the hands of local officials. Roadless areas and Wilderness areas are different, and both deserve protection. Roads are gateways to logging and ORV use, and the large body of literature on edge effects and habitat fragmentation should make this decision easy—Please keep the Roadless Rule intact. (Individual, Boulder, CO - #A20981.13110)

BECAUSE THE ORIGINAL PROCESS WAS SUFFICIENTLY LOCAL

In an increasingly "small" world, local is a term that has a changing meaning. In terms of national public lands, such as the National Forest System, all planning is inherently local. Since National Forests are "owned" equally by the citizens of the United States in a collective manner, it shouldn't matter whether a person lives in Florida or Nevada when it comes to management decisions on a National Forest in any given location. In that regard, I believe that **the original national process used in 1999 and 2000 to**

develop the Roadless Rule was appropriate and sufficiently “local”. (Individual, La Pine, OR - #A22107.10151)

BECAUSE IT REPRESENTS THE WILL OF THE PEOPLE

I read the newspapers and magazines. I use the Internet for research. I listen to the broadcast news. So please don't continue to insult my intelligence by maintaining that somehow the “public” has not had adequate input to the roadless area policy currently hanging fire in this administration. That's just nonsense. Feeding to the uninformed as a way of circumventing the expressed will of the people is almost criminal. Roadless policy has been studied and commented upon more thoroughly than any other forest policy in this nation's history. Good grief. (Individual, Spokane, WA - #A1057.12200)

The Sitka Conservation Society has consistently worked to protect America's last remaining Roadless Areas and inclusion of the Tongass National Forest in the Roadless Area Conservation Rule. We strongly oppose timber sales in any of the Inventoried Roadless Areas (IRAs) on the Tongas. Apparently, the American public agrees with us. In no fewer than eighteen separate opinion polls (conducted by both Republican and Democratic pollsters), the American public has shown strong support for national forest conservation. It is estimated that 76% of Americans (62% Republicans) support the Roadless Rule and inclusion of the Tongass N. F. (Organization, Sitka, AK - #A12003.10150)

In the case of the RACR, it is now mandatory that the Forest Service implement this rule to try to build a positive relationship with this national public. Subverting this national public desire will eventually lead to the demise of the Forest Service—the public wrath will not be denied. You are embarked on a course of consciously subverting a clear public mandate for the protection of roadless areas.

Many rural and local people support the roadless rule as part of the broad national mandate. The Forest Service must find ways to deal with the rhetoric of the few who would subvert not only the national will, but also what is best ecologically for the land. The vitriol of the minority against the RACR can be mitigated if the Forest Service simply worked with this constituency within the framework of the RACR—and you have lots of flexibility to do so. Environmental groups complained strongly during the development of the RACR that too much flexibility was embodied in the rule. This flexibility over time would allow the Forest Service to work with these local minorities in a positive way. Instead, your approach is to deny the clear and broad mandate and move to disenfranchise the people who own these forests and pay the bills. Hardly wise. (Individual, Corvallis, OR - #A13493.10150)

The forest service must serve the broad public interest by fully protecting the environmental, wildlife and aesthetic values overwhelmingly supported by the public and by firmly opposing economic exploration values which are completely incompatible with the maintenance of roadless area characteristics. The Forest Service should be respectful to those seeking to undermine roadless area values but must enforce the rules and the law, even if unpopular with a tiny minority of citizens and corporate interests who selfishly promote personal, temporary, economic gain over all other values. Those who promote commercial exploitation demands must be respectfully reminded that the vast majority of forest service lands are already managed for economic values and that a small percentage of the public lands in the United States of America must be managed for primarily ecological and aesthetic values. In a democratic society worthy of the name, the will of the majority must prevail, particularly when it is the result of an exhaustive, legally scrupulous process for seeking such public will. American citizens overwhelmingly want complete protection of our roadless areas as wilderness. (Individual, Port Angeles, WA - #A6179.15165)

The process for the ANPR has been less than honorable. The ANPR states in part that “there was inadequate opportunity for public review and comment on the roadless rule”. This is the opposite of the truth. Over a three-year period, over 1,600,000 Americans gave their opinion on the RACR. About 1,500,000 of them supported increased roadless protection. The scale of the public hearings was unprecedented. Yet, in response to these false allegations of inadequate opportunity for public comment, the ANPR allows only a poorly publicized 60-day comment period, in which comments on 10 questions

(8 of which are clearly biased towards the extractive industries that would benefit from alterations to the RACR) are given more weight than simple comments about roadless policy in general. The public has spoken, and the administration has an ethical and legal obligation to abide by the RACR. (Individual, Boulder, CO - #A14055.10152)

The Forest Service conducted an unusually extensive public participation process in California to solicit public input. The agency held 63 public meetings throughout the state. Support for the roadless area rule was and remains widespread and strong in California. Public opinion polling conducted in the state indicated that support was approximately 3 to 1 statewide. Approximately 140,000 public comments were submitted on the draft proposal from California; the overwhelming majority was in support. (State Agency, Sacramento, CA - #A18110.15110)

BECAUSE ROADLESS AREAS IN EASTERN FORESTS ARE SO SCARCE

A key finding of the recent interagency Southern Appalachian Assessment (SAA) was that only 4% of the 37 million acre multi-state region is in a roadless condition. Most of this acreage is on the National Forests. Roadless areas are the last vestiges of wilderness in the East. They are rare and precious, small and disparate. And destined to become smaller and even more degraded if present Forest Service policy and practices are not stopped. As an example of how bad the situation is, when the 600,000 acre Daniel Boone NF was recently “inventoried”, only a single tiny stand-alone roadless area (of around 1800 acres) was found on the entire Forest. Less than a half of 1% of the 1.1 million acres of NFs in Mississippi are inventoried as roadless by the FS. According to the May 2000 DEIS (pg. B-10), only 7% of the acreage in all the Southern Region NFs are designated as roadless areas. The entire Eastern United States (Forest Service Regions 8 and 9) contains less than 4% (1,543,000 acres) of the inventoried roadless lands outside of Alaska (see DEIS page 3-98). (Individual, Staunton, VA - #A29325.10111)

BECAUSE IT PRESERVES THE STATUS QUO

This rule preserves the status quo of actual uses in our National Forests by limiting development of areas that have never been developed, while not impeding already approved activities. The result of the public process is precedent-setting because it is typically the opposition to a proposed action that garners the greatest level of support and comment. In this case, it was supported for the status quo that received the overwhelming support of Americans. (Individual, Evergreen, CO - #A28071.10153)

8. Public Concern: The Forest Service should recognize that the Court’s concerns do not justify a departure from the Roadless Area Conservation Rule.

What are the Court’s and the plaintiff’s concerns that the Service has pledged to address? In its May 4 report to the Court, the Service has said that it shares the Court’s concerns about the process through which the Rule was promulgated, and that it wants to “ensure that Americans who live near these inventoried roadless areas have sufficient and meaningful opportunity to comment upon the Rule’s development and implementation.” As we understand them, these statements signal three things: 1. The Service intends to address the specific NEPA irregularities found by the Court. 2. The Service intends to provide for substantial public participation in the current review and in considering any subsequently proposed modifications to the Rule. 3. The Service intends to ensure that citizens who live near roadless areas have a voice in decision making under the Rule.

While we by no means wish to convey that the FRWG agrees with the Court’s analysis or the plaintiff’s concerns, it should be emphasized that none of these concerns even comes close to undermining, or justifying a departure from the Rule’s basic construct: management by considering site-specific exceptions from a national standard. On the contrary, these concerns clearly are capable of being addressed within that construct, through this rulemaking and perhaps through supplemental NEPA documentation . . . (Organization, Washington, DC - #A23283.15150)

9. Public Concern: The Forest Service should consider that revisiting the Roadless Area Conservation Rule will have negative effects.

IT IS A WASTE OF TAXPAYER MONEY

I understand that more comments were received on this regulation than ever in Forest Service history, and the great majority favored the Roadless Area Conservation Rule. It is reasonable to assume that many millions more agree with the million or so people who took the trouble to write. I cannot fathom therefore why this public comment period has been reopened except to fish for a different answer, one more to the liking of the narrow interests opposing this rule. I object to taxpayer money being wasted on revisiting a good rule that went through a lengthy and competently run public process. (Individual, Juneau, AK - #A23012.10152)

I would like to express outrage at the waste of taxpayer money being perpetrated in the name of properly determining public sentiment. Roadless-Area legislation proposed under the last administration resulted from one of the most all-encompassing public-outreach exercises ever undertaken. To claim that abundant opportunities were not available for public comment is to criminally misrepresent the efforts of those who came before you to this question. The American public spoke clearly and forcefully. Their present attempt to find some justification for ignoring those voices is undemocratic and unworthy of the American people or the resources for which they are quite obviously concerned. (Individual, Bloomington, IN - #A30275.10153)

It is baffling to people who are not career politicians as to how the government can spend the money on RARE I and RARE II, spend the money and the manpower over the years developing a policy and soliciting public comment, and then throw away the investment due to nothing more than a change of administration. This waste of taxpayer money is appalling. DON'T WASTE THE TIME AND MONEY OF THE PAST; DON'T THROW IT AWAY. (Individual, Lake Tomahawk, WI - #A29653.75600)

IT WILL WEAKEN PUBLIC TRUST IN THE FEDERAL GOVERNMENT

Any efforts to change this publicly mandated policy would significantly weaken the protections our wild forests deserve and would also weaken the public's trust in our federal government to do what is morally, ecologically and ethically right. (Individual, Morrisville, PA - #A4931.10111)

IT WILL WEAKEN PUBLIC TRUST IN THE FOREST SERVICE PLANNING PROCESS

The existing Rule provides a reasonable approach to protecting roadless areas on our national forests, including adequate exceptions to address concerns referenced in the ANPR. It was adopted after extensive study and public involvement, including 600 local hearings and over 1.6 million citizen comments, 95% in favor of the Rule. Through these public meetings and public comments on the roadless area conservation rule, there has been ample demonstration of public support for maintaining roadless areas in an unroaded condition. Reliance on this public involvement is crucial for continued respect and confidence in the Forest Service process. (Individual, Asheville, NC - #A22623.10153)

The ANPR implies that local decision-making is needed because protection is warranted for some roadless areas but not others. It states that most roadless areas previously were not recommended for wilderness designation due to low wilderness values, inadequate public support, or "other resource potentials." It observes that the resource values of roadless areas "vary in importance," specifically pointing out that roadless areas contain 9 million acres of "productive timberland." These statements exhibit the anti-wilderness, pro-timber mentality that has eroded public trust in Forest Service planning and created broad support for national regulatory protection of roadless areas. (Organization, Bellingham, WA - #A22958.10161)

IT WILL POLARIZE THE POLITICAL CLIMATE AND INCITE PEOPLE TO RADICAL ACTIONS

We all know why this roadless issue is being revisited and will ultimately be compromised to appease political interests. Let's at least have the decency to disclose the truth and the real consequences of building more roads, the uncertainty of the science behind this analysis should also be disclosed so that

decision makers realize they're going into this half blind, we don't have the ability to accurately predict the impacts and mitigation for anticipated impacts oftentimes fail. On the political end, you'll appease some greedy and/or misguided folks by building more roads but you'll anger untold masses of people and this will serve to further polarize the political climate and incite environmentalists toward radical avenues to achieve their goals. There is little choice when the proper channels have been followed that culminates in an executive order and then it's torn apart by special interests. (Individual, No Address - #A137.12210)

10. Public Concern: The Forest Service should recognize that many groups support the Roadless Area Conservation Rule.

SOME WESTERN GOVERNORS

The administration states that "western governors" are opposed to this ruling. That is a gross stretch of the truth. My governor, Gary Locke of Washington State, is a STRONG supporter of the ruling, as is Governor Kitzhaber of OR and Governor Davis of California. Our states collectively have more roadless areas than any of the "western governors" states that are now whining about public process. (Individual, Seattle, WA - #A84.15130)

LOCAL RESIDENTS

The Bush administration's claim of lack of local input is disingenuous at best. Local communities were heavily involved in the planning process for the Roadless Rule. Nearly three years in the making, the Roadless Area Conservation Rule was the most extensive Federal rule-making process in history. Over 600 public meetings were held nationwide, the majority of which were held on or in the vicinity of the national forests affected by the rule. In Alaska, roughly 7,500 people commented on the Roadless Rule and 6,200 of those comments favored the rule and inclusion of the Tongass and Chugach National Forests. In Sitka, 69 people spoke at the public hearing held by the Forest Service, and 63 spoke in favor of the policy, I'm not sure how much more local than that you can get—Sitka is surrounded by the Tongass N.F. (Organization, Sitka, AK - #A12003.10153)

The Conservation Rule was adopted after much public deliberation and the receipt of more comments (reports are an estimated 1.6 million) than have been received on any other issue. There could hardly have been more informed decisionmaking. You ask about what local participation should be involved, but there were 430 public meetings, including at least two meetings for every national forest. We understand that over 23,000 people participated in those meetings. This was a fair, open and very extensive process. Thus, input from local interests has already taken place. The Forest Service has already gone to a great deal of time and expense to solicit views from the public and from those near each national forest for input into the Conservation Rule. That rule is further supported by an environmental impact statement. (Organization, Birmingham, AL - #A21582.10153)

IT IS IMPORTANT TO NOTE THAT, CONTRARY TO CHIEF BOSWORTH'S ASSERTIONS, MANY RURAL RESIDENTS APPLAUD THE ROADLESS RULE. The majority of those who attended the meetings at the National Forest level during scoping and the development of the draft Environmental Impact Statement endorsed the RACR. In fact, many local residents called for even stronger protections than the final rule afforded roadless areas because they were concerned about quality of life issues and their local economies It is misleading for the Administration to portray the roadless rule as a federal land grab that local communities oppose. As evidenced by the testimony given at the 600 National Forest hearings, that is simply not the case. The record is clear: the majority of Americans, rural and urban, want their wild, public forests conserved. (Organization, Nevada City, CA - #A4941.10152)

The current Forest Service's Roadless Area Conservation Rule should stand as it is currently written. Last summer, I attended the public hearing in Bellingham, Washington regarding the proposed roadless policy. The public support for the roadless policy at that meeting in a western timber county was overwhelmingly in favor. Nearly all those who spoke . . . at the hearing were local Whatcom County

citizens. The few people I saw who spoke against the roadless policy were all from outside the area. (Elected Official, Whatcom County, WA - #A4955.10153)

AVERAGE CITIZENS

There are several areas where this [snowmobiles and ATVs] type of recreation can be done yet we have a militia-oriented radio host here telling people to break down the gates to trails that they illegally put in to begin with. These people threaten, spread anti-governmental conspiracy theories, give assassination lists on the air, threaten and commit property damage to those who speak out about their racism (I know this first hand as I have become a target of theirs along with my children after they called a Jewish Holocaust survivor a cheap whore on the air and then went into the Jewish banker world take over garbage) yet they are the only ones complaining about the Roadless issue. Normal, honest, non-militia citizens love it. (Individual, Kalispell, MT - #A26418.15123)

I just wanted you to know that some of the supporters of this popular government effort come from “middle-of-the-road” backgrounds. I live in southern California and own the brunt of my real estate in southern Oregon-Josephine County. I am neither hippy nor logger and was a republican activist until the advent of king George Bush . . . Currently, I am employed by Albertson’s grocery chain. (Individual, No Address - #A899.15111)

TRIBES

Your quote includes states, tribes, and other stakeholders in addition to local communities. That’s all well and fine, but didn’t states, tribes and other stakeholders already comment? What tribes are you soliciting comments from? The ones who have joined a lawsuit against the Forest Service? I currently live on the Nez Perce Reservation. The Nez Perce and their ancestors have lived in central Idaho for thousands of years. You can’t get more “local” than that. The Nez Perce Tribe fully supports the Roadless Rule. Didn’t you get their first letter? The Tribe has written a second letter, once again supporting the Rule. If you are truly looking for “local” input, I would suggest you read their letter. (Individual, Lewiston, ID - #A29569.10152)

Do Not Implement the Roadless Area Conservation Rule

11. Public Concern: The Forest Service should not implement the Roadless Area Conservation Rule.

I, myself do not see any real purpose to the roadless areas except to keep the public away from public land. Is there something going on here that I don’t know about? I can peacefully co-exist with livestock and many western ranchers can’t survive without the grazing permits that roadless areas put an end to. The large companies own thousands of acres of timberland, so, all that you are really hurting in the timber industry are the small companies that need public lands in order to stay in business. I don’t believe in so-called clear cutting and I think that any company cutting trees on public land should have to clear off old, dry brush that would cause disastrous forest fires. And, has anyone stopped to think that everything that we have come out of the ground in one way or another? It surely doesn’t seem that way to me. (Individual, No Address - #A8252.10112)

The roadless rule should be abolished totally and completely, never to be resurrected. Anything short of this is pure insanity, and totally un-American. It smacks of the Communist approach to people and resource control, and certainly doesn’t seem at all to represent the values of freedom that I grew up with. (Individual, Manti, UT - #A27830.10130)

BECAUSE IT IS THE PRODUCT OF A BIASED PROCESS

I am writing to oppose the Forest Service’s Roadless Area Conservation Rule as it now stands. This policy is the product of the most biased federal rulemaking in history, with most emphasizing eastern states absentee landlords who have no direct livelihood interest. (Individual, Spokane, WA - #A1711.10120)

I am very opposed to the Roadless designations being pursued by your agency throughout the United States. While I do favor reasonable and effective management of our national resources, including forests, this process extends way beyond what is reasonable. It is clear that environmental extremism is alive and well in our national service staff, and this is hugely disappointing to people who pay their taxes in support of government, and expect to have access to public lands when they visit. The extent of closures in forests and other public lands is just not acceptable.

I have always held a favorable view of the Forest Service, until recently. The Roadless Initiative has changed my view. Please share my message with other staff within your unit who are involved in Forest Planning and Land Use decisions. (Individual, Yucaipa, CA - #A12.10130)

I am writing to support revisiting the Forest Service's Roadless Area Conservation Rule as it now stands.

The rule represents a one sided approach to forest conservation, and in essence locks up the forests. What happened to the multiple use concept that allows responsible logging, mining, and drilling. (Individual, Salina, UT - #A1119.10130)

I am writing to ask you to repeal the Forest Service's Roadless Area Rule as it now stands. This policy is the product of the most one-sided opinion of federal rulemaking in history.

The rule represents a one-sided approach to forest conservation. Each specific area needs to be examined and ALL parties concerned must be informed and given their fair chance to voice their opinions.

The best thing to do is to trash the roadless plan as it is written and draft a new plan for the National Forests that includes access for the public recreation and responsible extraction of our valuable resources that these forests provide. (Individual, Phoenix, AZ - #A1699.10150)

BECAUSE IT IS BASED ON EMOTION, NOT LOGIC

I believe the proposed Roadless plan was based on emotional and unprovable science, by people who think with their hearts instead of using common sense logic. (Individual, No Address - #A1729.10130)

BECAUSE BENEFITS OF THE RULE ARE INFLATED BASED ON SUBJECTIVE REASONING

Benefits of the proposed rule are inflated based on subjective reasoning. There is scant evidence in the FEIS that the Forest Service has truly done any analysis that objectively considers the long-term impacts of this proposal. (Professional Society, Anchorage, AK - #A21707.20203)

BECAUSE IT WAS DEVELOPED WITHOUT LOCAL INPUT AND DUE PROCESS

I am strongly opposed to the Clinton Roadless Initiative Program. The program was implemented without local input and due process and in my opinion is in violation of the U.S. Constitution. I believe the U.S. Forest Service needs to consider the needs of all user groups when implementing policies that affect these users. (Individual, No Address - #A47.10130)

We believe there are significant policy and legal concerns with the January 2001 roadless regulations. It is essential that these decisions are made only after taking into account local conditions, local values and local input. The failure by the previous Administration to do this is precisely why the regulations are criticized for failing to provide an adequate opportunity for public comment (the over one million form e-mails and postcards generated by the Heritage Forest Campaign notwithstanding) and contributed heavily to the injunction issued by the U.S. District Court for the District of Idaho in *Kootenai Tribe of Idaho v. Veneman*, No. CV01-10-N-EJL, and *State of Idaho v. United States Forest Service*, No. CV01-11-N-EJL (D. Id. opinions filed April 5 and May 10, 2001). We urge the current Administration not to repeat the same mistake. (Association, Rockville, MD - #A13306.10130)

I think the entire roadless area designation process should be rethought out. Numerous public hearing should be held in all affected forest areas. Input from local people who depend on the use of forest service lands for economic survival should be consulted. These would include farmers, ranchers, loggers, miners, oil men.

This policy should not be implemented until the people of the west have a chance for input. (Individual, No Address - #A527.10133)

When the initial Roadless Area Conservation was announced in January, 2001, ARRA believed along with millions of other Americans, that the policy developed was a result of a top down approach dictated from Washington without the benefit of input from Americans living in close proximity to the forests managed by the U.S. Forest Service. Re-opening this rule for additional comment is an important step in remedying this serious oversight by the previous Administration. (Organization, Washington, DC - #A5069.10131)

I attended two public hearings on the proposed roadless rule last year. It was evident from responses to questions at the hearings that local and regional Forest Service personnel responsible for implementing the roadless rule were not fully certain of the content of the rule, not sure of the rule's implications for forest health and not confident of their ability to interpret the rule and then enforce it locally. The whole tone was of local administrators who had been blindsided by an initiative which their constituency had no part in shaping, but which they were now expected to defend and implement. (Professional Society, Eagle River, WI - #A19071.10132)

Alaskans are never heard on these issues because a bunch of people who have never been here, and do not understand how we live drown out our voices from the lower 48. It is not fair, and it is not right that people in Boston have more say about how we in Alaska live our lives than we Alaskans do. Nobody here cares how people in Boston live—why should outsiders have so much control over our lives? Imagine what would happen if Alaskans were able to shut down the third largest industry in the lower 48, as people from the lower 48 have done to us. There would be a revolution down there. (Individual, Anchorage, AK - #A15680.10131)

BECAUSE IT IGNORES PROGRESS MADE AT THE LOCAL LEVEL

The State of North Dakota has worked diligently with Forest Service personnel, oil and gas interests, ranchers and the environmental community during the planning process to address concerns regarding the Grasslands Management Plan. The Roadless rule trumps those efforts and ignores the progress being made at the local level. Implementation of the roadless rule will impede future cooperation among those groups. (Governor, State of North Dakota, - #A22065.15162)

BECAUSE ROADLESS ISSUES WERE ADEQUATELY DEALT WITH IN RARE I AND RARE II

We would hope that the Forest Service would by now have reasoned that the reason for so many lawsuits relating to the roadless review is because the agency clearly stepped out of bounds when considering the roadless review. It would be in the best interest of the Federal Government to rethink its position on roadless areas. Those issues were dealt with in the first go round of wilderness known as RARE I and RARE II. (Elected Official, San Juan County, UT - #A4890.10137)

Last summer, New Mexico's forests burned out of control, destroying millions of dollars of homes, private property and timber, not to mention the livestock and wildlife habitat, and the danger to watersheds as the late summer rains begin to fall. These fires burned so hot and fast because of years of fire suppression combined with restrictions on logging and grazing, creating a fuel load that was simply a disaster waiting to happen. It will take literally generations for these forests and watersheds to heal. The FS now is considering implementing an initiative across the US to limit timber harvest and road construction, making fire control even more difficult. The NMWGI strongly opposes the creation of roadless areas. (Organization, Albuquerque, NM - #A8813.10112)

BECAUSE ROADLESS AREAS ARE ALREADY ADEQUATELY PROTECTED

We do not need any more protection for, so called roadless areas. We have enough laws, already in place to keep all the off the road travel stopped. All the proposed wilderness study areas, have been inspected by congress and deemed not suitable for wilderness designation. What is it environmentalists don't understand about congress' decision. (Individual, Bishop, CA - #A4796.10112)

Areas not suitable for road construction are presently being adequately protected under policies now in existence without a national roadless policy. (Individual, Kalispell, MT - #A1071.10112)

I am writing because I do not support the Forest Service's Roadless Area Conservation Rule as it now stands. This policy is the product of the most extensive federal rulemaking in history, with more than 600 public hearing and 1.6 million public comments, and I believe the Forest Service has adequate means at its disposal to take proper care of all of its valuable resources without a need for more rules. (Individual, Grand Junction, CO - #A1696.10150)

The policies in effect prior to the Roadless Conservation Rule were completely adequate. (Individual, Albuquerque, NM - #A10497.10112)

I would support the no-action alternative. The Forest Service already has adequate administrative authority to control road development and Manage Lands. Page S-7 of the DEIS states. "Road construction and reconstruction would continue to be prohibited only where land management plan prescriptions prohibit such action". In Lander County a majority of unroaded portions of inventoried roadless areas already have vehicle access restrictions. The proposed rule is very similar to the no action alternative. The proposed rule is overly restrictive and limits local decisionmaking authority, particularly in communities like Austin, Kingston and Hadley that rely upon the development and use of the natural resources on the National Forest Lands. (Individual, Austin, NV - #A15794.10130)

BECAUSE THERE SHOULD BE NO ROADLESS AREAS

There should be no roadless areas therefore there is no need to develop a process to designate roadless areas. (Individual, Ogden, UT - #A494.10130)

BECAUSE IT DOES NOT REPRESENT A BALANCED APPROACH TO FOREST CONSERVATION

The rule represents an unbalanced approach to forest conservation. In federal forests where 87% of the land is already off limits to timber harvest, this wacko policy will set aside the last remaining forest land as wilderness—not to be managed for multiple uses. (Individual, Salem, OR - #A188.10130)

The rule does not represent a balanced approach to forest conservation. As written, it does not adequately address issues of fire management, forest health, access, and local input. (Individual, Pasadena, CA - #A979.10130)

I am writing NOT TO support the Forest Service's Roadless Area Conservation Rule as it now stands. This policy should be done away with.

The rule REPRESSES a balanced approach to forest conservation. (Individual, Knoxville, TN - #A456.10112)

As responsible users of the nation's public lands, we strongly urge that the Roadless Initiative (proposed by the previous presidential administration) be eliminated. It does not properly balance the needs of American citizens/taxpayers and environmental issues. We represent a significant number of groups and individuals who will be adversely affected by this measure, and we hope that the Forest Service President Bush, and Vice-President Cheney will act in the manner we suggest and expect. (Business, Corona, CA - #A747.10130)

As a native Montanan, I love the area I live in and appreciate the beauty of the natural world around us. My family and I respect the land and the creatures who live there. All of the people I know feel the same way.

The idea of closing off another 60 million acres of land to roadless areas seems crazy to me. We have lost countless small businesses and mills as it is and after the fire season of 2000 it amazes me that this is even an issue. We enjoy clean air and water here in Montana but with all of the smoke from the fires last

summer many people suffered from respiratory problems, especially the elderly, which is a high percentage of our state's population. (Individual, Kalispell, MT - #A994.10130)

BECAUSE IT DOES NOT ADDRESS THE DIFFERENT NEEDS OF EASTERN AND WESTERN FORESTS

The proposed Roadless Rule is a continuation of the non-use policies presently saturating the management of our forests. Preservation by non-use may be reasonable in extreme cases like New Jersey but it is not necessary in the Rocky Mountain region.

The proposed Roadless Rule is way out of balance with the needs of the public. (Organization, Helena, MT - #A13226.10130)

I am not sure that you read these letters. I think that you just count for or against. I live in the west not the east and I want a say in what happens to the forests in my area. I don't know anything about the National Forests in the east and wouldn't presume to tell them how to manage them. I don't want a one-size-fits all policy for our forests. In my opinion this isn't a Congressional decision. (Individual, Centerfield, UT - #A12776.10130)

BECAUSE IT DISPROPORTIONATELY AFFECTS WESTERN STATES

We would like to add our support in opposition to any further designation of roadless or wilderness areas.

Our western states have more public lands than any other geographical area (with the possible exception of Alaska) and this land mass should not be treated as a National Park for the rest of the country. (Individual, Columbia Falls, MT - #A1070.10112)

I am opposed to the roadless plan to lock up the natural resources and our public lands, I am an avid snowmobiler, hunter, fisherman, and all around user of public lands. This plan will lock me and thousands like me out!!! STOP THE WAR ON THE WEST!!!! (Individual, Whitefish, MT - #A1030.10130)

There is an angry rebellion gathering momentum. The decision to 'rethink' the recent changes in Federal Roadless Policy may be just in time; an opportunity to hear what the people of Nevada, as well as all the western states, are beginning to stand up and shout. (Individual, Gerlach, NV - #A1066.10130)

BECAUSE IT WILL MAKE THE JOB OF MANAGING FORESTS MORE DIFFICULT

In the environmentalists' fight to obtain this roadless area they placed a full page ad in the Idaho Statesman indicting that nothing would change if the roadless initiative was enacted. If this is truly the case, then why do we have to enact such a ridiculous policy in the first place. Of course the answer to that is that it does change things, it makes your job of managing an already cumbersome and politically controlled national forest system even more difficult. (Individual, No Address - #A14.10112)

In closing, I will refer to the current society of American Foresters Position Statement, *Roads in Forests*, renewed June 13, 1999, which explains the purpose of roads in the national forest system. "Under the Multiple Use and Sustained Yield Act, . . . the National Forest Management Act, the Forest Service . . . manages for seven separate purposes—water, wildlife, recreation, timber production, grazing, minerals, and wilderness." "To implement management plans, the Forest Service, and all forest managers, must have access to their forests through a well-maintained road system. In the case of public forests, this requires a substantial, dependable road budget for maintenance as well as reconstruction. Roads should be seen as a capitol investment, "We are concerned that the roadless regulations deviate from the multiple use statutory intent, and is inconsistent with the society of American Forester's road position. (Association, Salem, OR - #A21754.10112)

BECAUSE IT IS BASED ON INADEQUATE INFORMATION

The lack of site-specific information available to the Forest Service during the promulgation of the January 12, 2001 rule is readily apparent when one considers that, as an example, the "roadless area"

within the Grand Mesa-Uncompaghe National Forest system (“GMUG”) here in Colorado included within its boundaries 1) an existing underground coal mine which had previously conducted surface activities using temporary roads, 2) areas which in fact (if not by regulatory definition) contain roads, and 3) federally-owned minerals being developed under existing lease and ripe for future lease. The GMUG “roadless area” is adjacent to other existing mines operating under recently granted BLM leases which eventually would move into that area as additional coal resources are pursued. The dearth of information available to the Forest Service and to the public resulted in a predetermined outcome as boundary lines were fixed under a “national” rule before more specific local information was made available which pointed to a different approach. (Business or Association, Denver CO - #A20676.10141)

BECAUSE ITS SUPPORT HAS NOT BEEN ADEQUATELY DEMONSTRATED

The Roadless Conservation Rule was NOT supported by a majority of Americans, so therefore, it needs to be either corrected or eliminated. (Individual, Orange, CA - #A6764.10131)

The roadless initiative was ill conceived and poorly executed—at the instigation of conservation organizations who never have (and probably never will) represented the will of the people of this country. One point five million out of 250 million, plus—what a joke . . . (Individual, Gorham, NH - #A8943.10132)

BECAUSE THERE IS OPPOSITION TO IT

On March 31st of this year, the Montana State gave final approval of a House Joint Resolution in support of multiple use of National Forests and urging Congress and the President to overturn the Federal Roadless Initiative. That resolution was patterned after the Roadless Resolution passed by the membership of the Montana State AFL-CIO at their 2000 annual convention.

The Montana Coalition of Forest Counties has taken a strong position against the proposal. Lincoln and Flathead County Commissioners each placed the issue on their respective ballots and approximately 80% of the voters voted in opposition to the Roadless Initiative. (Elected Official, State of Montana, MT - #A18045.10130)

It astounds me that in spite of the reported over 1/2 million comments that were submitted in opposition to the roadless rule that the agency proceeded with the plan like no one had objected to it. (Individual, Austin, NV - #A15794.10130)

BECAUSE IT WILL PROMPT CIVIL DISOBEDIENCE PROTESTS

I could go on and on concerning the financial impact the rules would have and expound on dozens of other arguments. Let me forego all that and close by saying this. In 1776 a band of patriotic Americans boarded a ship in Boston Harbor and threw tea overboard in the first act of rebellion against a tyrannical government which had overstepped its bounds. I would consider the imposition of the proposed forest service rules to be just such an overstepping of government’s bounds in the instant case. If that happens, I will be one of the first to step to the plank and walk up the gangway to act in defiance of my government. I say that as a proud citizen and a veteran who has served our country in time of war. A few weeks ago I pointed out our kitchen window toward the mountains we love so dearly and told my wife that if people like Al Gore and the Forest Service have their way, we were as close to those mountains as we would ever be able to get. I tell you now, I am not alone in my sentiment. My passion for my mountains is shared by thousands upon thousands of others. We are a vast army who are not going to simply stand by and watch the Forest Service take away our rights of access to the forests we have been raised in and are now raising our children and grand children in. I will not be alone if and when the time comes that I must raise my mighty pen, my wallet and my fist against my government trying to take away my access to the mountains and forests that have formed a heritage and a home for me and my family. (Individual, Mount Pleasant, UT - #A26116.10112)

BECAUSE IT WILL INCREASE SAFETY HAZARDS

Restricting options for fire-fighting and forest management does not serve the public interest or protect the National Forest System. In its current form, the Final Rule will impose negative economic effects that are not justified by any corresponding benefits. Rather, the Final Rule compounds existing safety

hazards, lacks an important phase of regulatory review, and arguably does not meet the Forest Service's mandate to manage and preserve NFS resources. HAI [Helicopter Association International] urges the Department of Agriculture to revise or repeal the Final Rule at its earliest opportunity. (Business, Alexandria, VA - #A30200.12120)

12. Public Concern: The Forest Service should not use inadequate road maintenance funding as a reason for developing the Roadless Area Conservation Rule.

One of the problems cited by the agency as a justification for this rule is the fact that the USFS does not have adequate resources to properly maintain existing roads. This problem also can be addressed by considering an alternative of requesting additional funding for roads from Congress, or allowing road maintenance by the private sector which uses them for resource development. None of these alternatives were considered by the agency.

The January 12 Rule could have been crafted so that temporary (non-paved) roads may be permitted on an as-needed basis. Such an alternative should have been considered and published for public comment. (Business or Association, Spokane, WA - #A17351.17240)

13. Public Concern: The Forest Service should recognize that support for the Roadless Area Conservation Rule is the result of misrepresentation of current forest management practices.

The "wide public agreement" cited in support of the former President's plan is, I would argue, the result of years of misrepresentation of both the nature and the impacts of current national forest management. Long-time opponents of road building in national forests, such as the Wilderness Society and the Sierra Club, have joined with lawmakers who are anxious to curb spending on "corporate welfare" to continue their opposition to "below cost timber sales". The implication of much of what has been said is that roads are built in national forests solely for the purpose of making it easy for private companies to log those forests. Ignoring the fact that contributing to the nation's timber supply is one of the reasons for the existence of the national forest system, it must come as a great surprise to the millions who drive into national forests to hunt, fish, picnic, camp, and sight-see that these roads are intended only for logging. In truth, logging income pays for most of the roads, but we seldom hear talk of "below-cost recreational services" being provided. It would be an interesting experiment for the Forest Service to shut down its road system to public access and see if loggers are the only ones who complain. (Professional Society, Orono, ME - #A17644.15120)

Revision of the Roadless Area Conservation Rule

14. Public Concern: The Forest Service should revise the Roadless Area Conservation Rule.

This current Roadless Area Rule as approved by President Clinton is grossly wrong - procedurally, politically, economically, socially, biologically, and particularly defies common sense. It needs to be reassessed and re-issued considering the biological and environmental needs of the forest, the social and economic needs of the public and to place the desires of some segments of the grossly underinformed public in a proper context. (Individual, Whitefish, MT - #A13335.10130)

TO ADEQUATELY ADDRESS FOREST HEALTH, ACCESS, AND LOCAL INPUT

The Rule must be significantly revised to promote forest health, access, and local input. Careful, active, and local forest management will ensure the long-term protection of our forests. Modifications to the Rule should be facilitated to properly implement Congress' mandate for multiple uses of our forest. Local forest decisions should be supported by accurate, site-specific information. (Elected Official, Shasta County, CA - #A4943.10130)

The rule must be significantly revised to adequately address forest health concerns, access to private and state inholdings, and local input. Roadless areas must be accurately mapped at the forest level, including an inventory of classified and unclassified roads, in order that informed decisions can be made. Modifications to the Roadless Area Conservation Rule must take into consideration the need to access the national forest to provide for Congressionally mandated multiple uses. (Elected Official, Afton, WY - #A6066.10141)

The Coeur d'Alene Chamber of Commerce supports environmentally sensitive and responsible natural resource management, which ensures that forests are healthy for all who depend on them. In the spirit of keeping our public forestlands healthy and open to families, recreationists, foresters and other land management professionals, the Chamber asks the Forest Service to revise the Roadless Rule so that it truly protects roadless area values. Without a comprehensive and locally based process, future decisions regarding how to manage roadless areas will not result in any real protection of the many forest values people care about. We encourage you to provide a meaningful process that will allow those who are most affected by management decisions on public lands to be included and heard. (Business, Coeur d'Alene, ID - #A18004.10130)

The roadless designations should be based on what is good for the locale on a local level, say the state level. It should be based on what is good for the forests, people and animals that inhabit it, not on some group's personal agenda for the west. (Individual, Centerfield, UT - #A12776.10130)

TO ADDRESS ACCESS FOR RECREATION AND RESOURCE USE

I am writing to support a decision to repeal the Forest Service's Roadless Area Conservation Rule as it now stands. This policy is the product of the most one-sided opinion of federal rulemaking in history.

The rule represents a one-sided approach to forest conservation. Each specific area needs to be examined and ALL parties concerned must be informed and given their fair chance to voice their opinions.

The best thing to do is to trash the 'roadless plan' as it is written and draft a new plan for the National forests that includes access for the public for recreation and responsible extraction of our valuable resources that these forests provide. (Individual, Phoenix, AZ - #A1179.10130)

The Roadless Area initiative must be tossed out and rewritten as it did not address issues of recreational access. (Individual, Thousand Oaks, CA - #A891.10130)

TO OMIT FROM CONSIDERATION LANDS SUITABLE FOR TIMBER REMOVAL

I would like to see you revise the plan, omitting land that is suitable for timber production unless it also has some good potential for recreation or other uses. (Individual, Bigfork, MT - #A1079.10130)

TO PROVIDE FOR REASONABLE MANAGEMENT

I'm taking the time to write to you today because I'm concerned about the unjust closure of public land to use by responsible U.S. citizens. The dishonest establishment of the Clinton/Gore Roadless Rule made me very uneasy about the way access to public land is being handled. Caring and fair-minded individuals like you and I can see that it is an extreme measure that greatly needs revision. I urge you to modify this rule so that public land is thoughtfully and responsibly cared for while still being available for reasonable, managed use. No one wants these lands abused, but over-reacting to extremist alarms helps only a few special interests, and shuts the rest of us out. Please take another look and the roadless rule, and make it into something that it is good for everyone. (Individual, Pleasant Plains, IL - #A5445.12220)

BECAUSE IT WAS THE PRODUCT OF AN INADEQUATE PROCESS

Please fix the flaws in the Roadless Area Conservation Rule. Their inadequate process was contrary to law. Local, State and Federal concerns were ignored. 421,000 acres of private land were affected.

Forest health, public access and local input were not addressed. Mapping and classifications of roads did not get done. Congressionally mandated multiple users were not considered. (Individual, Deer River, MN - #A2873.10120)

I would like to express my appreciation to you and the Forest Service for deciding to take a more informed look at the Roadless Area Conservation Rule. This original process was started in a flawed and illegal manner and seemed to have its conclusions before it began to analyze the information. (Association, Yreka, CA - #A8302.10120)

15. Public Concern: The Forest Service should recognize that the Advance Notice of Proposed Rulemaking does not substantiate the need to revise the Roadless Area Conservation Rule.

Despite a series of assertions about the existing Rule and roadless area management more broadly, the ANPR does not substantiate the need for revisiting this long-contentious issue. Some of its assertions directly call the existing Rule into question; others do so only indirectly. None, however, shows how the rationale for and substantiation of the Rule as faulty or inadequate. (Organization, Olympia, WA - #A20145.11100)

Strengthen the Roadless Area Conservation Rule

16. Public Concern: The Forest Service should strengthen the Roadless Area Conservation Rule.

I would like to see the roadless plan preserved and even expanded. The timber companies represent a very small percentage of the population of the country and the vast majority of us want those roadless areas preserved. In my state of Washington, on the previous public comment period the responses were 96% in favor of the roadless initiative. If you are a Government of the people and not of the corporations, which is of course a debatable issue, then please preserve these great and beautiful lands for my son and his children. (Individual, Olympia, WA - #A534.10150)

The rules of Roadless Area Conservation need to be strengthened, not weakened. The total National Forest System is only 8.5 percent of the total land base of the United States. That leaves 91.5 percent for economic exploitation. The 58.5 million acres of inventoried roadless areas should not be opened for economic use. The United States must protect and conserve this national resource for the treasure it will be in the future. (Individual, Zanesville, OH - #A758.10150)

The Roadless Area Rule currently under reconsideration will preserve these jewels. It does not need to be changed. You ask, how should communities and private property near inventoried roadless areas be protected from the risks associated with natural events, such as major wildfires that may occur on adjacent federal lands? The current Rule allows for emergency access to all Roadless Areas; if anything this should be strengthened to ensure a continuation of Roadless status after emergency roads have been constructed. (Individual, Brunswick, ME - #A5070.10150)

The Roadless Area Conservation Rule should be implemented without change and strengthened to stop damage to these areas by ORV use and hard rock mining. All timber sales in the Tongass National Forest that violate the Rule should be stopped immediately. This administration should defend the Rule against lawsuits and quit trying to weaken environmental safeguards and public participation processes in the development of forest plans. (Organization, Tulsa, OK - #A15362.10150)

BY ELIMINATING EXCEPTIONS

If the Clinton administration's Roadless Initiative needs any changes at all, they are to tighten up some of the loopholes that allow exceptions, such as for "public health" and "safety". (Individual, Leadore, ID - #A20898.10150)

BY IDENTIFYING AREAS WHICH SHOULD NOT BE EXEMPTED FROM THE RULE

The Service should begin by defining the types and locations of roadless areas for which exceptions to the prohibitions should not be considered. This would provide an important improvement to the Rule by

placing the most socially and ecologically important inventoried areas off limits to road building and timber harvesting. Through the rulemaking, the Service should establish categories of roadless areas for which exceptions should not be granted, and then document and map those areas in the course of subsequent forest plan revisions. These would include areas with important or scarce social and ecological values such as: source drinking water areas, reference areas for research, areas of high or unique biological diversity and old growth forests, areas where other roadless lands are scarce, areas that provide cultural or historic importance, and all areas that provide unique or important season habitat for wildlife, fish and plant species. (Organization, Washington, DC - #A23283.10150)

Defense of the Roadless Area Conservation Rule

17. Public Concern: The Administration should defend the Roadless Area Conservation Rule against lawsuits.

Failing to appeal the Idaho court's preliminary injunction blocking enforcement of the January 12th rule, constitutes an abdication of responsibility and dereliction of duty on the part of the new administration. (Individual, Chico, CA - #A17483.10159)

It is the Bush Administration's attempts to thwart The Rule that is of greatest concern by far. The Bush Administration should stop . . . undermining the legality of the rule (which they are doing by collaborating with the plaintiff) and should instead, immediately begin mounting a vigorous defense against the lawsuits challenging the Rule. (Individual, Hatboro, PA - #A8834.10159)

By allowing the deadline to pass, the federal government failed to appeal the court's decision. Fortunately, a coalition of Environmental Organizations has stepped in to fill the breach, despite the handicap of the federal bailout. Due to its failure to appeal, the new administration has now turned its back on, and shown a total lack of concern, for the 1.6 million interested parties who have submitted comments, 95% of whom supported the prohibition of new roads in the national forest roadless areas.

Dale Bosworth, in his letter of June 7, 2001, stated that "it is necessary for the agency to act decisively, proactively, and with common sense to ensure that our efforts to protect roadless values will not be confined to legal proceedings in courtrooms scattered throughout the country."

Rather than vigorously defending the public interest in open court, the Forest Service has acted in fear of litigation. Perhaps their actions are based on the fact that the court's decision is consistent with their existing bias demonstrated in the Federal Register and the several press releases of the USDA. The new administration appears to put its total faith in one lower court judge's decision, without review by a higher court. Instead of judicial review in open court, it appears that the decision will be made in Washington D.C. behind closed doors by politically motivated decision makers. If the conclusions already adopted by the new administration are carried out, the roadless issues will not be carried out by numerous courtrooms throughout the country, but will be based on local concerns confined to vastly more individual national forest proceedings throughout the entire nation. (Individual, Chico, CA - #A17483.10159)

I write to ask, as an official comment on any changes to the Roadless Rule, that the rule not be undermined through the creation of loopholes and exemptions to the protections in the original policy. Similarly, I ask that you do whatever is necessary to defend the current rule, that was to be implemented in June, from current legal challenges. Then the public could regain some faith in the Forest Service as an organization that was dedicated to environmental protection and restoration of public lands instead of one that was captive to corporate interests. The Roadless Area Conservation Rule should be implemented immediately, and without exemption, as it was signed on January 5, 2001. (Individual, Portland, OR - #A4816.10150)

You also claimed in the Federal Register, as further justification for the current rule making, that, "eight lawsuits, involving seven states, in six judicial districts of four federal circuits have been filed against

the January 12, 2001 rule.” Apparently you think that because so many suits were filed in so many districts in so many circuits, that you should just roll over and play dead. The filing of a lawsuit, of even many lawsuits, does not mean, however, that the federal government took an improper action. The federal government should have vigorously defended its rule on court, rather than caving in and starting the rule making all over again.

Also in Federal Register you cite the preliminary injunction issues by the Idaho District Court. I believe this court’s decision will be easily reversed on the appeal which has been filed by third parties. . . . The federal government should have appealed the District Court’s decision, and should have vigorously defended its Roadless Rule before the Circuit Court. Instead, no appeal was filed, and rather than waiting for a decision on the appeal filed by other parties, the government decided to launch another public process and change the rule. (Individual, Sitka, AK - #A24495.10159)

Do you remember Attorney General John Ashcroft saying during his Senate confirmation hearings that he would enforce the laws of the land? Why did Ashcroft’s office not vigorously fight the lawsuits brought by Boise-Cascade, the state of Idaho and others against the Roadless Area Conservation Rule? No matter how ill-advised it was for the Bush administration to put the current comment period, we are faced with the following questions: During this holding period, is the Roadless law of the land, or is it not the law of the land? If it is not the law of the land, how can the Boise-Cascade, the state of Idaho and others bring lawsuits against it? Should not any attempt to bring such suits against non-law have been forcefully fought by the Attorney General’s office? If the Roadless Rule is the law of the land during this holding period, why did the Attorney General’s office only put up a token defense in court against the lawsuits? Is it that by some TECHNICALITY that the state of Idaho, Boise-Cascade and others can bring lawsuits against a law of the land, which at the same time is not the law of the land from the standpoint of the Attorney General’s office? (Is this not comparable to “It depends on what your definition of ‘is’ is”?) Did John Ashcroft give FALSE TESTIMONY before the Senate confirmation committee when he said that he would enforce the law of the land? (Individual, Los Alamos, NM - #A13846.10159)

18. Public Concern: The Administration should not defend the Roadless Area Conservation Rule against lawsuits.

Most Americans oppose this rule. Don’t implement the original rule, and don’t waste taxpayer money defending it against industry and other lawsuits. These are PUBLIC lands and do NOT belong to the environmentalist crowd alone! (Individual, Marthasville, MO - #A6704.10130)

Other

19. Public Concern: The Forest Service should clarify the Roadless Area Conservation Rule.

I am writing to state my support of the Forest Service’s efforts to fix the fatal flaws in the Roadless Area Conservation Rule. This rule was passed with flawed if not misguided information and is subject to legality due to its substantive concerns by elected officials. It is also difficult to interpret. (Individual, Mayport, PA - #A8711.10141)

20. Public Concern: The Forest Service should consider that it has already issued a decision on the Roadless Area Conservation Rule and should now emphasize work on more pressing issues

The Forest Service has already issued a decision for the protection of inventoried roadless areas. It seems that the only reason you are revisiting this issue is because of the new administration. The Forest Service should build on its past accomplishments, not undo them. The Forest Service should emphasize work on more pressing issues, such as compliance with NEPA, the threat of unnatural wildfire, and the spread of noxious weeds. (Individual, Bemidji, MN - #A8784.10150)

21. Public Concern: The Forest Service should separate the Roadless Area Conservation Rule into two policies to administer lands in the eastern and western United States.

There appears to be a much different view about public lands in the western US than here Back East of the Mississippi River, and there are a lot of differences in the areas being considered. The eastern US has a much larger population and unfortunately very little public land as compared to the West. We seem to treat our areas as more tourism/recreational areas versus the agricultural/resource banking of western counter parts.

The Forest Service, if it hasn't already, should seriously consider breaking the roadless area plan into two (2) separate plans for administrative purposes. This would allow the Forest Service to address issues such as fire hazards and inholdings, which are more serious in the West. The eastern US has very little roadless areas left and reserve/refuges for many plants and animal species that are overlooked or unknown to the general public. The forest system holds much more than robins, deer, bear, and a few raccoons. Many new animals are found in the Smokey Mountains National Park each year, though they may be butterflies, moths, or lichens, it still matters. It wouldn't be here if it didn't. (Individual, Granite Falls, NC - #A21281.45341)

22. Public Concern: The Forest Service should ensure that one state does not shoulder disproportionate effects of a national roadless rule.

The Forest Service must be willing to develop a procedure to ensure that its national policy is carried by the nation as a whole. In other words, the Forest Service must ensure that the citizens of Wyoming are not forced to shoulder a disproportionate share of what is in essence a national decision, demanded by people who have never stepped foot in the State and will suffer no economic or emotional hardship as a result of sending the Service a preprinted postcard allegedly "supporting" the Roadless Actions. If the Forest Service cannot ensure that Wyoming does not end up carrying a particular national policy, then it should not be adopted. Until the impact of the Forest Service's actions can be distributed equally across the entire country, then the interests of Wyoming must take precedence. (State Agency, Cheyenne, WY - #A22608.13120)

Issue Identification

This section includes one subsection: Adequacy of Questions in the Advance Notice of Proposed Rulemaking.

Adequacy of Questions in the Advance Notice of Proposed Rulemaking

Summary

In general, comments which question the adequacy of the 10 questions posed in the Advance Notice of Proposed Rulemaking come from those who ask that the Roadless Area Conservation Rule be implemented. Those who ask that the Rule not be implemented do not often comment specifically on the adequacy of the 10 questions. These respondents view the questions as adequate, not by saying it specifically, but in their general agreement for taking another look at issues associated with roadless areas.

Most commonly, respondents who question the adequacy of the 10 questions allege that the questions are unclear, biased, misleading, and have built-in assumptions designed to lead to certain responses. Some believe that these questions have already been addressed in the previous rule and it is disingenuous to ask them again. These respondents sometimes assert that they do not think the new Administration likes the previous policy, so they are looking for different answers that seem to have nothing to do with genuine concern for social, economic or ecological issues. Respondents state that the questions are framed to favor advocates of active management and allows resource users to define the terms of the debate.

As noted above, the view that the 10 questions are adequate is generally implicit in comments which stress the need to more fully consider roadless issues before making a decision. A few respondents, however, explicitly say the questions are a positive step toward adequate public involvement.

Adequacy of Questions; General

23. Public Concern: The Forest Service should recognize various problems with the 10 questions asked in the Advance Notice of Proposed Rulemaking.

THEY ARE UNCLEAR

Really, it is unclear what is meant by “local forest planning” in this question. For sure, this must not mean that local citizens should have any more influence over roadless decisions than non-local citizens.

Also, I continually see the terms “protect and manage” when reading what the USFS [United States Forest Service] will do within inventoried roadless areas. It’s unclear what the author of the questions meant by including these 2 words. Why do they automatically belong together? What’s the difference between these 2 words as they are used here? Is it possible to protect an area and not manage it? Yes, it sure is. It certainly is possible to manage an area, and not protect it. This has been happening (in places) on federally managed Forest Service lands for decades. (Individual, Grangeville, ID - #A830.11110)

[How should roadless areas be managed to provide for healthy forests and to protect forests from severe wildfire, insects and disease?]

The question is a paradox; a question with diametrically opposed statements. (Individual, Philomath, OR - #A943.11130)

These properties are in roaded areas, so if any fire harms them, it is in a roaded area. This question is pretty strange. (Individual, Wheaton, IL - #A52.11140)

This question is vague. What are you evaluating the IRAs for? Are you evaluating them for consideration as designated Wilderness Areas? Are you evaluating them for recreational potential? Clearly, the factors to consider when “evaluating IRAs” depend upon the purpose of the evaluation. The Forest Service has already identified positive values of roadless area conservation, such as wildlife habitat, clean water, recreational opportunities, scientific research values, and even economic values that come from recreational use and the improvement of nearby property values due to the improved quality of life that comes from nearby natural areas. (Individual, Palo Alto, CA - #A15827.45100)

The question is worded, what are the characteristics, environmental values, social and economic considerations and other factors the U.S.F.S. should it consider as it evaluates inventoried roadless areas. The question should have been worded thusly. What are the characteristics, environmental value, social and economic “values” and other factors the U.S.F.S. should consider as it evaluates inventoried roadless areas. (Elected Official, Iron County, MI - #A3612.11160)

[Question 3] This question implies that fire, insects, and diseases are undesired elements in a forest ecosystem, even in roadless areas. I would have expected a question to have been phrased in this way 40 years ago, but not today in light of a more thorough understanding of forest ecosystem processes. The use of the term “healthy forests” in this context is unscientific and inappropriate (see McClelland and McClelland. Wildlife Society Bulletin. 1999. 27[3]: 846-857). In the remaining roadless areas, commercial logging is not needed as part of any scientific management strategy. (Individual, West Glacier, MT - #A5946.30100)

THEY ARE BIASED

This is another unfair question in that it suggests States, tribes, organizations, and private citizens do not presently have access to their properties. There is nothing in the ban on new roads that closes any existing access to anyone’s properties. The only access that this ban on new roads would entail is that it will prevent timber and mining companies from destroying portions of our forests by grading roadways so they can access our natural resources, and therefore destroy even more timber and remove more hills and mountains for profit. (Individual, Port Angeles, WA - #A1044.11150)

The Roadless Area Conservation Plan already provides for access to state and private in-holdings. Roadless areas would be treated like any other national forest lands regarding in-holder access. This again is a biased question that can leave a reader with the false conclusion that there is no in-holder access under current rules. (Individual, No Address - #A4502.11150)

This [Question 3] is a biased and bold question! I will illustrate by rewording it. How should inventoried roadless areas be managed to provide for healthy watersheds, including playing an ever more-important role in protection of biodiversity, protection of water quality, and providing the correct balance of natural processes to give the ecosystem the resiliency to weather insect and disease outbreaks or wildfire over many disturbance cycles, spanning hundreds of years? (Individual, Lacey, WA - #A17998.11130)

How should communities and private property near inventoried roadless areas be protected from the risk associated with natural events, such as major wildfires that may occur on adjacent federal lands?

I would turn this around to read: How should inventoried roadless areas be protected from the risks associated with proximity to communities and private property, such as tree or wildlife poaching, human-caused wildfires, illegal roadbuilding etc? (Individual, Lacey, WA - #A17998.11140)

We believe the public has already spoken on this matter. This new round of comment is less open and responsive than the first round. There are no public hearings and the ten questions are inappropriately biased against roadless area protection, i.e. we all want to see lives and homes protected during wildfire, but roadless areas play little if any role in that protection. A new round of comments would likely yield the same results as the previous round and is therefore unnecessary and a waste of taxpayer dollars. We can only conclude that this latest call for input is an attempt to delay, weaken, or perhaps ultimately scrap the RACR. (Organization, Missoula, MT - #A21359.11100)

THEY HAVE BUILT-IN ASSUMPTIONS

Should Inventoried Roadless Areas selected for future roadless protection through the local forest plan revision process be proposed to Congress for wilderness designation, or should they be maintained under a specific designation for roadless area management under the forest plan?

The phrasing of this question assumes that the RACR will be shelved and that all roadless area considerations will revert to the individual forests. It is my understanding in responding to this questionnaire that this has not yet been decided. I hope this is the case. (Individual, Seattle, WA - #A11805.25000)

The “10 questions” format for scoping on this proposal is also inappropriate, as it presupposes an outcome that drastically revises the RACR. The questions also pose issues that have been asked since the first day of RACR rulemaking. I must therefore conclude that these questions simply provide a cover of rationality over a decision prompted by a change in Administration, not by any genuine policy matters grounded in ecology, sociology, or economics. (United States Representative, Georgia, - #A693.11100)

The assumptions underlying your questions are blatantly anthropocentric, and are skewed toward allowing continued exploitation of natural areas. They seemingly grow out of the conviction that humans are the only species that matters, and that they have the right to appropriate every square inch of the earth’s surface to their own material ends, regardless of the damage done to plant and animal communities. Property rights are evidently assumed to trump all other rights, just as monetary values are assumed to trump all other values. Monoculture is better than diversity, and 100 years of “custom and culture” are entitled to jeopardize the results of millions of years of evolution. (Individual, Dallas, OR - #A3697.11100)

[Question 9] The very premise of this question is false and therefore it should be either rephrased or eliminated from consideration. (Organization, Denver, CO - #A29624.11190)

THEY LEAD TO CERTAIN RESPONSES

We have made a few brief comments within the context of the 10 questions in the Federal Register notice. We do note that the text of the questions, many of which seem to overlap, seems predisposed to yield a certain answer. Additionally, the questions ask for opinions on natural resource management much broader than the rulemaking in a short (60-day) comment period. Although we do not disagree with the direction the 10 questions lead respondents in, we think this is a peculiar and possibly inappropriate way to elicit public comment. (Association, Washington, DC - #A17887.11100)

Should inventoried roadless areas selected for future roadless protection through the local forest plan revision process be proposed to Congress for wilderness designation or should they be maintained under a specific designation for roadless area management under the forest plan? . . . You have crafted this question in a leading fashion, with intent to obfuscate the matter and arrive at a predetermined outcome, which is to throw the Rule out by throwing it into the planning process for each national forest. This would be a disastrous outcome because it will result in certain elimination of inventoried roadless areas. (Individual, Ward, CO - #A18076.11180)

[Question 3] Well, what do we mean by healthy forests? That’s a loaded term. Allowing wildfire to play its natural role so that buildup of hazardous fuels does not occur seems to be wise; active management of

the urban interface seems to be wise, but wholesale “management” of large blocks of remote backcountry seems ridiculous. The Bitterroot and other fires have shown that what matters in saving buildings is treatment in the immediate vicinity, not the backcountry miles away. The way this question is worded appears to lead the respondent toward an answer that must already be in someone’s mind. (Individual, Jackson, WY - #A10527.30100)

THEY ARE TOO OPEN TO INTERPRETATION

That’s a broad question that can be interpreted to mean too many different things. (Individual, Eagle Creek, OR - #A29956.11130)

THEY ARE NOT RELEVANT

[Question 8] This does not seem to be relevant. Some of the current roadless areas may become special wilderness areas. So what? The important thing is that the roadless areas are protected from roads and logging. (Individual, Elmhurst, IL - #A8039.25000)

THEY DISTRACT PEOPLE FROM THE MAIN ISSUES

You really know how to word a question to get the goat of those who feel the “local forest plan revision process” is simply a way to thwart the will of the majority. This question is entirely independent of the original and rightful ruling and could be addressed without revising the rule and it appears to be an attempt to distract opinion from the main issues. Geez people, the rightful ruling states that, “areas currently inventoried as roadless remain roadless without resource extraction”. Is it that complicated? As long as that happens then, the ruling and the people’s will be upheld. (Individual, Seattle, WA - #A21682.11180)

THEY DISCOURAGE PUBLIC INVOLVEMENT

Our organization objects to the delayed implementation of the roadless policy by the Secretary of Agriculture. We object to the questions that you put forth—directing public comments to such issues as fire, access to inholdings, floods and forest health. This directed questioning tactic discourages public input to such issues as wildlife or fish species viability, quality wildlife habitat, clean water, backcountry hunting experiences and scenery. As you are well aware, the Science report for the Interior Columbia Basin Planning effort pointed out that roadless areas were the most intact parts of the Rocky Mountain ecosystem in the planning area. We are disappointed and discouraged that a professional land management agency would resort to such public involvement tactics to solicit a skewed public response on such valuable natural resources affecting far more resources issues than those for which you solicited comment. (Organization, Helena, MT - #A8255.11100)

First of all, I think your 10 questions are designed to intimidate citizens from commenting on the “roadless area” issue. And yes, I do realize these questions are optional. (Individual, Idaho Falls, ID - #A27740.11100)

THEY ONLY REFLECT THE VIEWS OF THE SMALL MINORITY WHO OPPOSE ROADLESS AREA PROTECTION

The ten questions for public comment mostly rehash the complaints and myths of the small minority that opposes roadless area protection. For example, the ANPR asks for input on the best way to provide access to private and state land inholdings in roadless areas, even though the Roadless Rule makes it abundantly clear that it has no effect on inholder access. These issues were fully addressed during the three-year public process leading up to January 2001. (Organization, Pikeville, TN - #A5167.10152)

THEY ATTEMPT TO JUSTIFY THE REVERSAL OF THE ROADLESS AREA CONSERVATION RULE

We feel the 10 questions, to help guide the decision process, are just a poor attempt to illicit opinions and comments that coincide with those of industry so that the reversal of these rules can be justified. We are insulted by the way the questions attempt to manipulate the public into responding unfavorably to the Current Rules. (Individual, Seattle, WA - #A19246.11100)

The above are all shamelessly leading questions, obviously fishing for an answer to justify the Forestry Circus', the current administration's and the various public lands commodity industries, and their bought-and-paid-for elected hacks' clamor for "local control". A pox on all of you.

This is an obvious situation where they didn't like the answers received, so they reworded the question, making them more leading and asked them again, hoping for answers more to their liking. (Individual, Dillion, MT - #A28767.11100)

THEIR INTENT IS TO DIVERT ATTENTION FROM THE ADMINISTRATION'S ATTEMPT TO DISQUALIFY THE RULE

The 10 questions are general in scope and non-scientific in nature, and one can only assume that their intent is to divert attention from the administration's attempt to completely disqualify the Rule. (Individual, Livingston, MT - #A17081.11100)

THEY ARE AN ATTEMPT TO GIVE GREATER WEIGHT TO LOCAL CITIZENS' COMMENTS

In earlier stages of the RAC process a truly historic level of public involvement occurred, both on a national level and on a local level throughout the National Forest system. The process was fair and open (in sharp contrast to this one's lack of any intention to hold public hearings). Comments from the whole spectrum of local advocacy groups was solicited and obtained. Local people turned out in droves to voice their opinions. The interest groups that are not objecting to the outcome are the same ones who have been benefiting at the expense of other users and the public treasury for decades. Dissatisfied with the result of open and public hearings, they now want a more closed process specially designed to give greater value to their comments than the ordinary citizen's. We believe question two is a sham that is intended to produce the rationale for granting that desire. (Organization, Juneau, AK - #A23263.11120)

THEY FOCUS EXCLUSIVELY ON THE ROLE OF LOCAL FOREST PLANNING AND FAIL TO MENTION THE ROADLESS AREA CONSERVATION RULE

The management of roadless areas is a matter of national importance. We are concerned that the questions to the public in the July 10 notice focus exclusively on the role of local forest planning in managing the country's national forests—and never mention the role of national policies like the roadless rule. We urge the agency not to undermine the rule's guaranteed protections for future generations by giving local agency officials broad discretion over the management of roadless areas. (United States Senator, New York - #A23325.13110)

THEY ENCOURAGE CONFLICT BETWEEN DIVERSE GROUPS

I recognize that this input was solicited in order to get comments on the rule-making process. As for the questions on the USFS roadless area response website, in my opinion they take the wrong approach. They seem directed at creating an area-by-area food fight at the local level, pitting environmentalists against the timber, mining and ranching interests (and perhaps some tribal elements), to determine the fate of each and every tract of land. (Individual, Whitethorn, CA - #A27998.11100)

THEY ARE FRAMED TO FAVOR RESOURCE USERS

I am outraged by this process and the questions included with the Advance Notice of Proposed Rulemaking. The framing of the questions show bias favoring advocates of exploitation and of "local control," which translates into weakened protection of roadless areas. I am one of many, many citizens who spent hours and hours participating in the Forest Service's three-year process that led to the Roadless Rule, and I am incensed that more of my time is required to respond to this issue after the conclusion of the process and the announcement of the Rule, and that efforts are made to relax environmental safeguards protecting our forests and to weaken public participation in forest management decisions. (Individual, Blue Ridge, GA - #A15666.11100)

THEY LET RESOURCE USERS DEFINE THE TERMS OF THE DEBATE

And now, they're asking for more comments to further delay protection for wild areas. It's like telling citizens to vote again because they didn't like the results. They've posed ten questions that let industry define the terms of the debate. The questions favor private over public rights, subdivision and industrial development over conservation, and they raise many issues already addressed by existing policies—such as fire, access to inholdings, floods, and forest health. (Individual, Twain Harte, CA - #A15652.11100)

THEY DO NOT CONTRIBUTE TO A HEALTHY AND REASONABLE DEBATE ABOUT THE VALUE OF ROADLESS AREAS

The recent attempt to revisit the roadless area policy is appalling, and shows a disturbing contempt for public participation. The 10 questions posed for consideration are absurdly slanted toward heavy handed management, and do not contribute to a healthy, reasoned debate about the value of roadless areas, I ask you to protect our roadless areas, and implement the roadless area policy that was to be the roadless area policy that was to be implemented at the start of this year. (Individual, Missoula, MT - #A17681.12111)

24. Public Concern: The Forest Service should explain why none of the 10 questions in the Advance Notice of Proposed Rulemaking address inventoried roadless areas as fully functioning ecosystems.

My first question is: who wrote these questions?

So much of the focus is on local decisionmaking. These roadless areas are in our National Forests. This is a national issue.

The true magic, at least in an ecological sense, is that these inventoried roadless areas represent fully functioning ecosystems. No question directly pertains to this issue. Why is this?

Two questions relate to fire management and private property. The focus on this issue is excessive. It is unfortunate that one of these ten valuable questions was wasted in this manner. (Individual, Walla Walla, WA - #A17698.11100)

25. Public Concern: The Forest Service should clarify whether the 10 questions in the Advance Notice of Proposed Rulemaking are an attempt to conduct scoping for a new or supplemental EIS.**AND WHETHER PREVIOUS PUBLIC COMMENTS WILL BE CONSIDERED**

We take issue with the Bush Administration adding questions and issues, after the fact, that are outside the scope of the Environmental Impact Statements on the Roadless Policy without conducting a proper NEPA process. Is this scoping for a new or supplemental EIS? Why have our previous comments been ignored? (Organization, Bigfork, MT - #A17742.11100)

26. The Forest Service should recognize that all of the issues addressed in the 10 questions in the Advance Notice of Proposed Rulemaking were already addressed.

I support the Roadless Area Conservation Rule just as it is. The questions posed in this new review process have already been answered in the rule to my satisfaction. The vast majority of land in this country is roaded and open to development. The tiny amount that is not should be kept roadless and wild to provide the ecosystem services that only natural wild lands can provide. (Individual, Missoula, MT - #A5609.10150)

None of these issues were left unaddressed in the original rule. It is a waste of my time to have to reiterate my support for this Rule. But I will do so anyway, because I feel a strong commitment to America's future. (Individual, Lewiston, ID - #A29569.10152)

27. Public Concern: The Forest Service should consider that the 10 questions in the Advance Notice of Proposed Rulemaking are no substitute for the public involvement process.

It is clear that this current 10 Question Game is a attempt by the Cheney/Bush administration to overturn the Roadless Rule in order to favor their friends in the extractive industries and the ORV crowd for political purposes. It is also in violation of the NEPA regulations, since the major action of reversing the Roadless Rule (or of severely weakening it) requires a long process of public hearings with ample opportunity for all interested citizens to comment. This 10 Question Game is no substitute for the public

process. I am requesting the environmental and legal organization to which I belong to file suit against the USFS for a clear and egregious violation of NEPA. (Individual, Mancos, CO - #A15596.20203)

28. Public Concern: The Forest Service should eliminate the use of questions to solicit public comment.

Eliminate the future employment of difficult comment requirements such as these questions. They only serve to confuse and/or discourage potential responders. Majority must rule in the democratic system, and it strongly supports the Roadless Rule as proven by the overwhelming response of the last comment period. Comment periods should remain, but without the impediment of cryptic questions. (Individual, Lafayette, CO - #A26745.15152)

29. Public Concern: The Forest Service should recognize that the 10 questions in the Advance Notice of Proposed Rulemaking are a positive step toward adequate public involvement.

You are on the right track with your request for response on the roadless issue rather than the Clinton/Gore process, which everyone knew was a scam. Your questions are thoughtful and if responded to honestly, with real concern for the roadless areas by all the parties, should give you a good basis on which to make your decisions. The process can be considered democratic but it is not a popular vote. You will never get anything close to agreement from all the stakeholders on the roadless question because the views are so polarized and strong. (Individual, Sandy, OR - #A13471.15000)

This questionnaire is a positive step in ensuring that the voice of all Americans can be heard, rather than the shouting voices of a few. (Individual, Atlanta, GA - #A16459.14410)

Adequacy of Specific Questions

30. Public Concern: The Forest Service should recognize that Question 3 in the Advance Notice of Proposed Rulemaking is biased.

BECAUSE IT IMPLIES THAT THINNING AND ROAD CONSTRUCTION ARE ESSENTIAL TO FOREST HEALTH

[Question 3] This question is clearly phrased to suggest that heavy-handed thinning and road construction are essential to the desired forest health and wildfire hazard objectives. This is patently not true. (Individual, Missoula, MT - #A9106.30100)

BECAUSE IT REFLECTS A LACK OF KNOWLEDGE OF FOREST ECOLOGY

[Question 3] This question reflects a poor understanding of forest ecology. (Individual, South Royalton, VT - #A22114.11100)

31. Public Concern: The Forest Service should define “near” as used in Question 4 in the Advance Notice of Proposed Rulemaking.

How should communities and private property near inventoried roadless areas be protected from the risks associated with natural events, such as major wildfires that may occur on adjacent federal lands?

Define “near”: how “near” is “near”? (Individual, Leadore, ID - #A28841.35200)

32. Public Concern: The Forest Service should recognize that Question 4 in the Advance Notice of Proposed Rulemaking is misleading.

BECAUSE IT IMPLIES THAT ROADLESS AREAS POSE A FIRE THREAT TO HOMES AND COMMUNITIES

[Question 4] The wording of this question makes the roadless areas seem like a threat. In most forests, they are so small and remote that they are much less of a threat than the roaded parts of the forest. In most cases they are probably not at the borders of the national forests, so they are not next to homes or communities anyway. (Individual, Northfield, MN - #A22395.11140)

[Question 4] This is a very misleading and poorly worded question which seems to blame roadless areas for the fire threat to private property, when in almost every case it is the already roaded and mismanaged Forest Service lands that need the species and spacing control work to reduce fuel loading and create safer zones where it will be easier to stop fires near private property. (Individual, Olympia, WA - #A20849.11140)

[Q4] First, this question implies that National Forest inventoried roadless areas are prone or somehow at greater risk to natural events such as lightning, insects or disease than roaded National Forest lands or adjacent communities and private lands. Also, this question could easily be turned around: "How should National Forest lands be protected from risks associated with natural events (or individual carelessness) that may occur on adjacent community or private lands?" All property interests, public and private, share equal risk for the occurrence of natural events. Likewise, adjacent owners share a responsibility to prevent or control fire, insect or disease on their respective lands.

Some techniques, such as creating defensible space along property lines and in urban interface zones, can reduce the risk of fire, insect or disease spread. However, to posit this question in a manner that suggests roading somehow reduces the risk of natural events on those lands is ludicrous. (Individual, Lyons, OR - #A13491.35000)

33. Public Concern: The Forest Service should address various problems with Question 5 in the Advance Notice of Proposed Rulemaking.

IT IS OUT OF SCOPE FOR THIS ANALYSIS

What is the best way to implement the laws that ensure States, tribes, organizations, and private citizens have reasonable access to property they own within inventoried roadless areas?

This question is beyond the scope of this analysis. (Individual, Cave Junction, OR - #A17110.11150)

IT REFLECTS AN INADEQUATE REVIEW OF THE ROADLESS AREA CONSERVATION RULE

Roadless areas are the same as all other national forest lands with respect to inholder access. Posing this question does not reflect due attention having been paid to the Roadless Area Rule by the one asking it. (Individual, Bigfork, MT - #A17221.11150)

IT RAISES SUSPICIONS THAT MORE IS BEING ADDRESSED THAN REASONABLE ACCESS

It is not clear why this question is on the list since inholdings already have legal access. It raises suspicions that more is being asked for than reasonable access. (Organization, Anchorage, AK - #A17358.40100)

DEFINE "REASONABLE ACCESS"

What is the best way to implement the laws that ensure states, tribes, organizations, and private citizens have reasonable access to property they own in inventoried roadless areas?

This question is another straw dog. Define "reasonable access". (Individual, Leadore, ID - #A20898.11150)

34. Public Concern: The Forest Service should recognize that Question 6 in the Advance Notice of Proposed Rulemaking should be asked during the National Environmental Policy Act process.

[Question 6] You are asking a question that will be different then for every area of the country. (Not all communities are the same.) This question must be asked during the NEPA process, not now. (Conservation District, Meeteetse, WY - #A17665.11160)

35. Public Concern: The Forest Service should clarify whether Question 8 in the Advance Notice of Proposed Rulemaking refers to the designation of additional roadless areas.

BEYOND THOSE ALREADY IDENTIFIED IN THE ROADLESS AREA CONSERVATION RULE

[Question 8] We are not clear whether you refer to the designation of additional roadless areas beyond those already identified in the Roadless Area Rule. (Individual, Deridder, LA - #A28678.11180)

36. Public Concern: The Forest Service should recognize that Question 8 in the Advance Notice of Proposed Rulemaking is inappropriate for addressing roadless area protection.

BECAUSE WILDERNESS DESIGNATION IS OUTSIDE THE SCOPE

Who, by the way, designed the 10 questions for you? Look at Question 8. We are supposed to be commenting on future rule making for roadless designation, or so I assume. Yet, you throw in the question for us to answer which ties it to wilderness designation. That is like throwing red meat to the wolves. We are not in the wilderness debate. We are supposed to be restricted to "roadless." They are not the same. (Individual, Kalispell, MT - #A27715.11100)

BECAUSE THE FOREST SERVICE IS ALREADY REQUIRED TO INVENTORY FOR WILDERNESS AREA CANDIDATES DURING THE FOREST PLANNING PROCESS

[Question 8] This is a moot question. The Forest Service is already required to inventory for candidate wilderness areas in the planning process. (Organization, Moab, UT - #A30528.11180)

37. Public Concern: The Forest Service should recognize that Question 9 in the Advance Notice of Proposed Rulemaking goes beyond the issue of management of inventoried roadless areas.

[Question 9] goes well beyond the issue of management of inventoried roadless areas and is the essence of the debate over the purposes for which the National Forests are managed. (Organization, Chantilly, VA - #A3350.13200)